Northwestern Steel and Wire Company

Pre-RCRA Landfill
Corrective Measures Implementation
Semi-Annual Progress Report

March 22, 2001 through September 22, 2001

January 31, 2002

CONTENTS

1.0 INTRODUCTION

This semi-annual progress report the is the fifth progress report for the renewed RCRA Part B permit for Northwestern Steel and Wire Company (NWSW), Sterling, Illinois. This report documents the Corrective Measures Implementation (CMI) being conducted on the pre-RCRA landfill located at the NWSW facility. The report covers the period of March 22, 2001 through September 22, 2001. The CMI is being conducted in accordance with the approved CMI operation of the corrective measures selected to protect human health and the environment. The CMI work plan contains the procedures necessary to monitor the performance of the corrective measures implemented at the pre-RCRA landfill.

1.1 History of the Pre-RCRA Landfill

The landfill is located approximately 500 feet north of the Rock River (Figure 1) and covers approximately 13.5 acres and is approximately eight (8) to ten (10) feet deep. Solid waste was disposed in the pre-RCRA landfill beginning in 1974. The waste disposed in the pre-RCRA landfill consisted of slag, brick, construction debris, and two sludges generated by on-site pollution control systems. The pre-RCRA landfill was closed in 1980 and a new RCRA landfill opened to receive the two sludges only. This new landfill received a Part B permit for the disposal of these two sludges on November 4, 1987. The Part B permit was subsequently renewed for ten years. The new permit was issued on March 10, 1999 with an effective date of April 14, 1999.

One condition of the initial RCRA landfill permit required a RCRA Facility Investigation (RFI) of the pre-RCRA landfill to determine if any releases from the landfill had occurred. The RFI was conducted in phases and determined that trichloroethylene (TCE), cis 1,2-dichloroethylene (DCE), and vinyl chloride (VC) were present in the groundwater beneath and downgradient from the landfill at elevated concentrations. Based on the findings of the RFI, the United States Environmental Protection Agency (USEPA) required that NWSW conduct a Corrective Measures Study (CMS) to

determine the best corrective measure alternative to achieve an acceptable level of risk within the exposed population. The CMS consisted of three distinct tasks: 1) additional field tests, 2) a risk assessment, and 3) an evaluation of potential corrective measures and recommendation of the alternative(s) that would result in an acceptable risk to human health.

1.2 Description of the Selected CMI Remedy

The various remediation technologies were evaluated as to their potential applicability to the pre-RCRA Landfill situation. This evaluation included no action, limited action, source control, groundwater remediation, and a combination of source control and groundwater remediation. The risk assessment showed that the present situation results in an acceptable level of risk to human health and the environment. Therefore the no action and limited action alternatives are acceptable means of complying with the goals of the CMS. Both result in the protection of human health. The limited action alternative, which is incorporated in the Part B permit modification effective March 22, 1993, offers the additional benefit of on-going monitoring which will provide for the detection of changes in concentrations of the compounds of concern (TCE, DCE and VC). The renewed permit removed the testing requirement for TCE, since TCE has not been detected in any of the monitoring wells for over eight years.

2.0 CMI OPERATIONS

The corrective measure design for the pre-RCRA landfill consists of 1) a system to prevent unauthorized disturbance of the soil and fill in the pre-RCRA landfill, and 2) a system of continued groundwater monitoring until the landfill meets the cleanup objectives contained in the Part B permit. These corrective measures, which have not been altered since the last semi-annual progress report, are described below.

2.1 Prevention of Unauthorized Disturbance

Unauthorized disturbance of the soil and fill in the pre-RCRA landfill are prevented by NWSW's existing facility security system. NWSW has a facility security system in place to prevent access by unauthorized personnel to the pre-RCRA landfill. NWSW employs 4 full-time guards. One guard supervises each eight-hour shift. The guard normally conducts two inspections of the plant perimeter each shift to assure unauthorized personnel are not present. The pre-RCRA landfill area may be included in these inspections.

A security fence with no trespassing signs posted at various places along the fence surrounds the facility site occupied by NWSW. Access to the facility is gained through secured gates; therefore preventing unauthorized personnel from entering the facility. The main access gates at Avenue K and Wallace Streets are monitored for access 24 hours by guards. A gate located on the western edge of the facility, adjacent to the non-hazardous waste landfill, remains closed and locked with access available to authorized personnel only. Additional signs have been posted around the pre-RCRA landfill as needed.

In March of 2001, NWSW landfill personnel discovered that the southeast corner of the landfill cover had been disturbed with a narrow trench. Preliminary investigation indicated that the Union Pacific Railroad may have buried an electrical cable 2-3 feet deep in that area. The disturbed area runs from an electrical box north of the landfill to a control shed next to the railroad tracks south of the landfill. NWSW has not yet been able to contact the correct railroad personnel, but will continue to do so.

2.2 Groundwater Sampling Procedures

The groundwater monitoring wells around the pre-RCRA landfill are shown in Figure 2. The renewed Part B permit has identified the monitoring wells with new letter/number designations. Previous designations were MW-X and have been changed to G10X, so for example, MW-6 is now G106.

The renewed RCRA permit requires that monitoring wells G103, G104, R105, G111, G116 and G117 be sampled semi-annually in April-May and October-November, and that monitoring wells G102, G106, G108, G112, G115 and G 118 be sampled annually in April-May. Monitoring wells G103-4, R106, G111 and G116-7 delineate a Groundwater Management Zone (GMZ) at the site.

The first year of required quarterly sampling was completed with the May 10, 1994 sampling event. NWSW is presently in a semi-annual monitoring program.
On May 22, 2001 twelve monitoring wells were sampled, as is the annual requirement. The results of this sampling are being submitted with this progress report.

According to Mrs. E. Kay Ingles of the Daily Analytical Laboratory (now PDC Laboratories), the monitoring wells were sampled according to the following procedures.

Static water levels and well depth were measured in each well prior to sampling. Water levels were measured three consecutive times to the nearest 0.01 foot using a steel tape or electrical water level sensor, and recorded in the field notebook. Prior to collecting groundwater samples for chemical analysis, water standing in the well casing and filter pack was purged so that the sample would be obtained from water representative of groundwater in the aquifer. A minimum of three well casing volumes of water was removed using a bailer or an inertial pump; whichever was appropriate for the depth of the well. Purged water was monitored for pH and specific conductance. Purging was considered complete when a minimum of three well casing volumes had been purged and the pH and specific conductance parameters had stabilized. Purged groundwater was temporarily stored in dedicated plastic containers and pumped back into each monitoring well after completion of each sampling event.

Groundwater samples from each well were collected using a clean Teflon® bailer. Groundwater samples were carefully poured from the sampling bailer into pre-cleaned,

laboratory-supplied glass VOA vials with Teflon® septum caps. The VOA vials were completely filled to eliminate air bubbles. Each groundwater sample was sealed and labeled using labels provided by the analytical laboratory. The sample identification for each sample was as follows:

- Site Identification (NWSW for Northwestern Steel and Wire)
- Monitoring Well Number (G1XX)
- Ground water sample number (GW1) increasing sequentially.

An example groundwater sample identification number is NWSW-G110-GW2, which indicates that this sample is the second collected at the Northwestern Steel and Wire site from monitoring well G110. Samples were placed on ice in a cooler for sample preservation. Water temperature, pH, Eh, and specific conductance measurements were measured and recorded in the field notebook at the time of sampling. Field measurement equipment were calibrated daily according to the manufacturer's recommendations.

As part of the quality assurance program, one duplicate groundwater sample and one field equipment blank per sampling event was collected and submitted to the laboratory for contaminant analysis. In addition, a trip blank was submitted with each sample shipment and analyzed for VOCs. Samples were presented as described above and shipped to the analytical laboratory in a timely manner. Chain-of-custody forms for the samples were included in each shipment.

Groundwater monitoring and sampling equipment was decontaminated prior to use at each monitoring well using procedures discussed in Section 9.12 of the CMI to prevent the possibility of cross-contamination between monitoring wells. Care was taken to prevent the decontaminated well purging and sampling equipment from coming into contact with the ground surface.

When samples were received at the laboratory, sample containers were inspected for integrity, proper labeling, proper preservation, and properly completed chain of custody form(s). The samples were logged in by the laboratory and a unique laboratory sample

number assigned to each sample. Laboratory sample numbers were entered into the laboratory's master logbook and used on sample laboratory sheets. Other pertinent information such as the date and time of sample receipt was also recorded. Samples were stored in secured refrigerators at the laboratory.

Groundwater samples were analyzed for VC and DCE. Detailed information on the analytical procedures such as potential interferences, precision and accuracy of the methodology, and method detection limits are identified in Test Methods for Evaluating Solid Waste, SW-846 (EPA, 1986). For each groundwater sampling episode, laboratory quality assurance/quality control (QA/QC) consisted of analyzing field blanks, field duplicates, and standard laboratory QA/QC samples. A complete laboratory analytical report from PDC Analytical Laboratories is provided as Appendix A.

2.3 Groundwater Sampling Results

During the May 22-23 sampling event, monitoring wells G102-5, R106, G108, G111-12 and G115-18 were sampled and analyzed for VC and DCE. Tables 1 and 2 summarize the results of the groundwater sampling conducted for the CMI Program.

The results presented in Table 1 show that for the twelve wells sampled on May 22-23, six show concentrations below the VC detection level; three wells (G104, G105, and G117) have lower VC concentrations than the last time these wells were sampled. The VC concentration at wells G103 and G116 increased. For this sampling event, the VC concentration in G104 was within the calibration range of the laboratory instrumentation. Consequently, no sample dilution prior to analysis was necessary as had been required once before. The VC concentration at well G116 did exceed the maximum allowable permit levels for this well. The maximum permitted level of VC for G116 is 14 ug/L, and the May 22nd result was 18 ug/L. Soon after receiving these results, NWSW resampled G116 on July 27, 2001. The results of that sampling gave <2.0 ug/L, so we believe the well has returned to compliance.

Table 2 provides the analytical results for DCE during the most recent CMI Sampling. The May 22-23 results for the 12 monitoring wells sampled shows DCE levels below detection limit in five wells, an increase in DCE concentration in four wells (G102, G103, G111 and G118), and a decrease in DCE concentration in four wells (G104, G105, G116 and G117) from previous sampling. The DCE concentration in G117 did not exceed the maximum allowable permit level of 97ug/L.

3.0 PROBLEMS ENCOUNTERED

A problem encountered during the six months that are the subject of this report for the implementation of the CMI plan was the elevated concentration of VC in well G116. The July retesting, however, showed that the VC concentration had dropped to non-detect. Since the VC concentrations are within permit limits, no further steps will be taken. A second problem encountered remains the disturbance to a small corner of the landfill by trenching for an electrical cable. The trench was made and backfilled before NWSW personnel were aware of the disturbance. NWSW personnel continue to look for reasons for the disturbance.

4.0 PERSONNEL CHANGES

On May 19, 2001 NWSW announced the shutdown of operations. Over the next several weeks almost all of the employees were laid off. The project management organization remains the same as initially described in the CMI Work Plan including changes described in prior progress reports, but the chain of command in section 9.3 of the Health and Safety Plan will now replace Karrol Phillips as Site Supervisor and Site Safety Officer with David Long.

Sections 2.2 and 9.3(4) of the CMI Work Plan reference Daily Analytical Laboratories as the sampling and analyzing entity for the site. Peoria Disposal Company acquired Daily

Analytical Laboratories, and as a result the sampling and analytical work is now being done by PDC Laboratories, Inc. Many of the personnel involved remain the same, including Mr. Kurt Stepping as the Laboratory Manager.

5.0 ACTIVITIES FOR THE NEXT REPORTING PERIOD

5.1 Description of Activities

The planned activities for the next reporting period include the continued operation and maintenance of the corrective measures implementation program as described in the CMI work plan. This will include periodic landfill inspections and maintenance. The groundwater sampling program and monitoring of the performance of the corrective measures implementation will also continue on a semi-annual basis in accordance with the CMI work plan.

5.2 Schedule

A schedule for future groundwater sampling and reporting requirements is provided in Figure 3.

6.0 TRIGGERING OF CONTINGENT CORRECTIVE MEASURES

Section III (G)(1)(c) of the permit establishes maximum allowable DCE and VC concentrations in monitoring wells G103-5, G111 and G116-17. If an individual maximum concentration is exceeded, then the contingent corrective measures must be implemented. As discussed in Section 2.3, Groundwater Sampling Results, the individual triggering concentrations for VC at well G116 was exceeded. However, since subsequent sampling showed a return to lower VC values, no additional steps will be taken. There has also been evidence of unauthorized disturbance of the pre-RCRA landfill soils or fill, and NWSW will continue to investigate how and why this occurred. No contingent corrective measures have been triggered at this time.

7.0 COMMUNITY RELATIONS ACTIVITIES

The Community Relations Plan (CRP) was prepared to guide community relations activities during the implementation of corrective measures at NWSW's pre-RCRA Landfill. The purposes of the CRP are to make available to the local community, information concerning the corrective measures actions, and to facilitate communication between NWSW and the community. During this period of the CMI, no citizens or interested parties have contacted NWSW concerning the CMI operations at the pre-RCRA Landfill.

7.1 Status of the Community Relations Objectives

This section presents the status of the community relations objectives used during the implementation of the corrective measures to ensure that the community is included in the process. The following techniques were organized according to the objectives of the community relations program:

1. Objective: Provide Community with Information.

   Technique: Establish Information Repository

   Purpose: To provide site-specific information to the community.

   Actions Taken: The information repository was established at the following location:

   Northwestern Steel and Wire Company
   121 Wallace Street
   P.O. Box 618
   Sterling, IL 61081-0618
   Telephone: (815) 625-2500

2. Objective: Respond to Community Concerns and Needs that Arise During the Corrective Measures Implementation.

   Technique: Monitor Community Concerns.

   Purpose: To continually assess and address community concerns throughout the implementation of the corrective measures.

Action Taken: NWSW has identified David E. Long, Environmental Manager, as the contact person to whom citizens or groups can direct their written concerns and questions. NWSW has provided a telephone number for monitoring community concerns. The representative from NWSW is accessible by telephone 5 days a week, Monday through Friday, from 8:00 am to 5:00 p.m. at (815) 625-2500 ext. 2451.

3. Objective: Provide for Effective Management of the Community Relations Program.

Technique: Management of Community Relations Program.

Purpose: To address community concerns that emerge during the implementation of the corrective measures.

Action Taken: No community concerns have emerged during this period of the CMI. No comments or questions have been received during the period covered by this progress report.

word/long/anrpt2

FIGURE 3

SCHEDULE FOR FUTURE CMI ACTIVITIES

GROUNDWATER SAMPLING SEMI-ANNUAL, 6 WELLS	**MID-NOVEMBER, 2001**
CMI PROGRESS REPORT	**APRIL, 2002**
GROUNDWATER SAMPLING, ANNUAL, 12 WELLS	**MID-MAY, 2002**
CMI PROGRESS REPORT	**OCTOBER, 2002**

Table 2. Northwestern Steel and Wire Company Pre-Rcra Landfill Groundwater Sampling

cis-1, 2 DCE Analytical Results, ug/L

Monitoring Well	G101	G102	G103	G104	G105	G106	G107	G108	G109	G110	G111	G112	G113	G114	G115	G116	G117	G118
Permit Max.																	97	
5/13-14/99		<5	16	27	19	<5		<5			20	<5			<5	33	24	5.6
11/11/1999			17	11	25						7.4					65	38	
5/16-17/00		<2	5	5	19	<2		<2			15	<2			5	28	12	<2
11/14/2000			<2	6	16						60					35	15	
02/06/2001																37		
05/22-23/01		7	32	<5	13	<5		<5			73	<5			<5	34	7	16
07/27/2001																29		

* Permit Maximum is the maximum concentration allowed by Section III (G)(1)(c) of the permit.

** Compound present below reporting limit

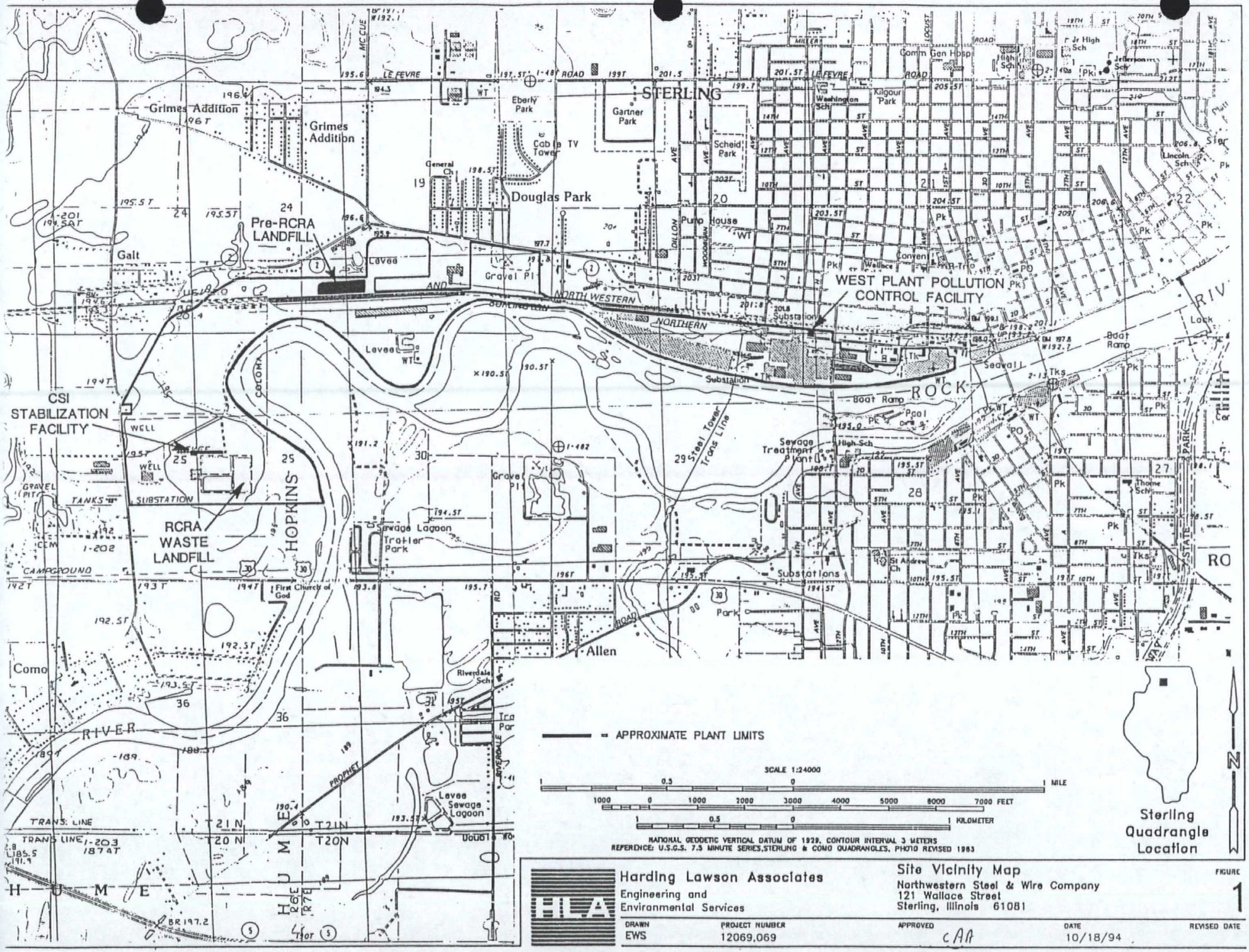
Table 1. Northwestern Steel and Wire Company Pre-Rcra Landfill Groundwater Sampling

Vinyl Chloride Analytical Results, ug/L

Monitoring Well	G101	G102	G103	G104	G105	G106	G107	G108	G109	G110	G111	G112	G113	G114	G115	G116	G117	G118
Permit Max.			**240**	**277**	**44**						**8**					**14**	**151**	
5/13-14/99		<2	75	200	20	<2		<2			<2	<2			<2	<2	78	<2
11/11/1999			140	87	13						12					28	89	
5/16-17/00		<5	52	36	19	<5		<5			<5	<5			<5	11	62	<5
11/14/2000			58	98	15						<5					17	98	
02/06/2001																14		
05/22-23/01		<2	160	66	14	<2		<2			5	<2			<2	18	76	<2
07/27/2001																<2		

* Permit Maximum is the maximum concentration allowed by Section III (G)(1)(c) of the permit.

** Compound present below reporting limit



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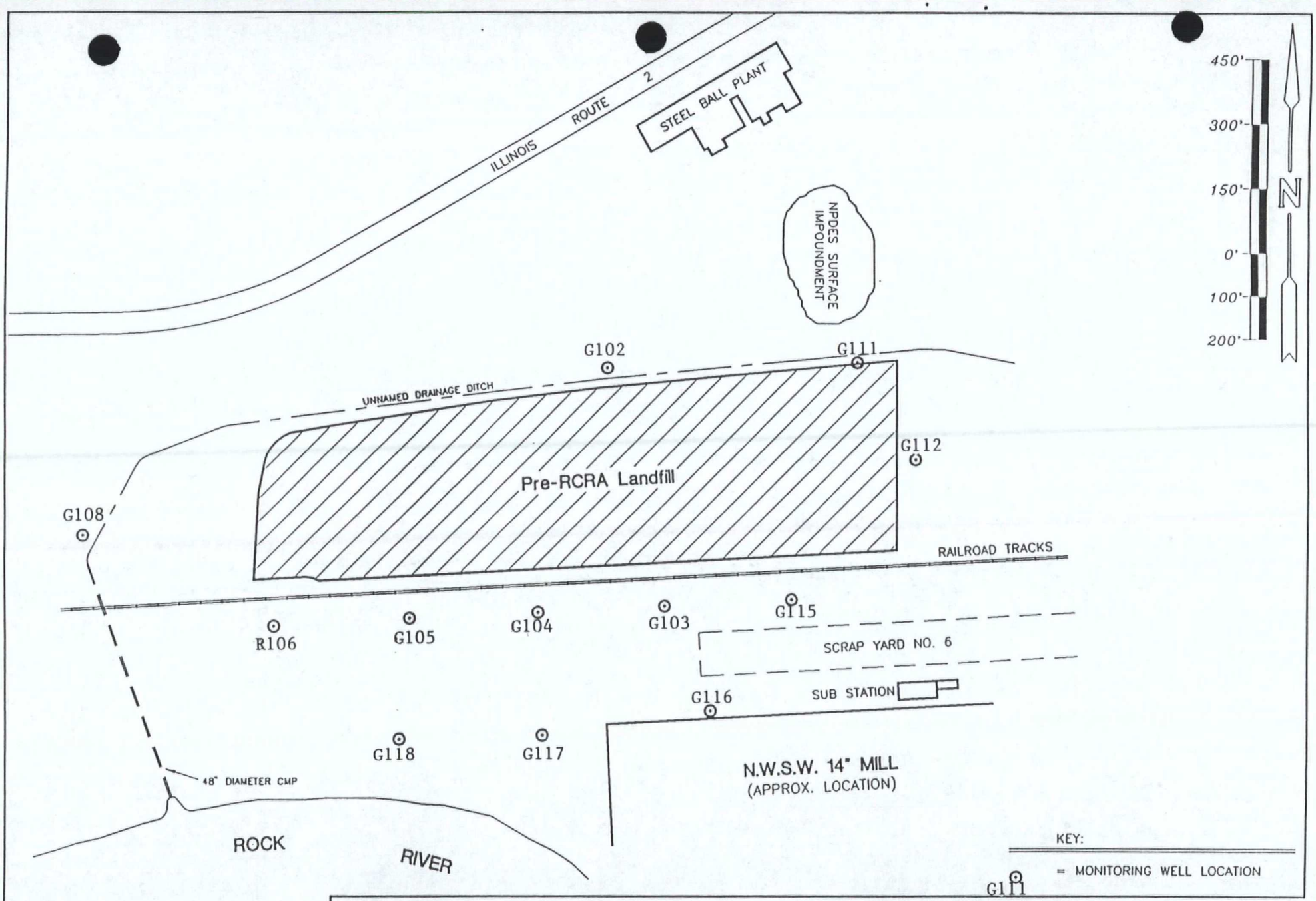
Engineering and Environmental Services

Site Vicinity Map
Northwestern Steel & Wire Company
121 Wallace Street
Sterling, Illinois 61081

FIGURE 1

DRAWN	PROJECT NUMBER	APPROVED	DATE	REVISED DATE
EWS	12069,069	CAA	10/18/94	



Harding Lawson Associates
Engineering and
Environmental Services

Monitoring Well Location Map
Pre-RCRA Landfill
Northwestern Steel & Wire Company
Sterling, Illinois 61081

FIGURE
2

DRAWN	PROJECT NUMBER	APPROVED	DATE	REVISED DATE
EWS	12069.11.1	MLS	09/16/93	3/10/00

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Report Cover Page

Northwestern Steel & Wire Co.
121 Wallace Street

Sterling, IL 61081

Attn: Mr. Dave Long

Date Received: 23-May-01
Date Reported: 28-Jun-01
PO #: H2 00 -63878
PDC Cust. # : 275706

Login No. 01052940

This report includes information regarding the following described samples as received by the laboratory and is only valid for the parameters tested. This report contains 14 results page(s) not including the cover page(s).

Sample No.	Client ID	Site	Locator
01052940-1	NWSW GW	PRE-RCRA LF	MW 2
01052940-2	NWSW GW	PRE-RCRA LF	MW 3
01052940-3	NWSW GW	PRE-RCRA LF	MW 4
01052940-4	NWSW GW	PRE-RCRA LF	MW 5
01052940-5	NWSW GW	PRE-RCRA LF	MW 6
01052940-6	NWSW GW	PRE-RCRA LF	MW 8
01052940-7	NWSW GW	PRE-RCRA LF	MW 11
01052940-8	NWSW GW	PRE-RCRA LF	MW 12
01052940-9	NWSW GW	PRE-RCRA LF	MW 15
01052940-10	NWSW GW	PRE-RCRA LF	MW 16
01052940-11	NWSW GW	PRE-RCRA LF	MW 17
01052940-12	FIELD DUPLICATE	PRE-RCRA LF	MW 17 DUP
01052940-13	NWSW GW	PRE-RCRA LF	MW 18
01052940-14	FIELD BLANK	PRE-RCRA LF	FIELD BLANK

Certified by: _____
Kurt C. Stepping, Director of Client Services

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State of Illinois Bacteriological Analysis in Drinking Water Certified Lab Registry No. 17533
State of Arkansas Certified Wastewater and Hazardous Waste Lab
State of Indiana Certified Drinking Water Lab No. C-IL-04
State of Iowa Certified Wastewater Lab No. 240
American Industrial Hygiene Association Bulk/Air Asbestos Proficiency Program Lab ID No. 101206
State of North Dakota Wastewater and Hazardous Waste CertifiedLab No. R-094
State of Wisconsin Certified Wastewater and Hazardous Waste Lab ID No. 998294430

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Laboratory Results

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PO #: H2 00 -63878
PDC Cust. # : 275706

Login No. 01052940

Sample No: 01052940-1
Client ID: NWSW GW
Site: PRE-RCRA LF
Locator: MW 2
Collect Date: 22-MAY-01 14:20

Parameter		Result	Units	Date	By
SW-846 Method 8260B					
cis-1,2-Dichloroethene		7.0	ug/l	24-May-01 14:32	TJP
Vinyl chloride	<	2.0	ug/l	24-May-01 14:32	TJP

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Login No. 01052940

Sample No: 01052940-2
Client ID: NWSW GW
Site: PRE-RCRA LF
Locator: MW 3
Collect Date: 23-MAY-01 08:59

Parameter	Result	Units	Date	By
SW-846 Method 8260B				
cis-1,2-Dichloroethene	32.	ug/l	24-May-01 15:01	TJP
Vinyl chloride	160	ug/l	24-May-01 15:01	TJP

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Login No. 01052940

Sample No: 01052940-3
Client ID: NWSW GW
Site: PRE-RCRA LF
Locator: MW 4
Collect Date: 23-MAY-01 08:25

Parameter		Result	Units	Date	By
SW-846 Method 8260B					
cis-1,2-Dichloroethene	<	5.0	ug/l	24-May-01 15:31	TJP
Vinyl chloride		66.	ug/l	24-May-01 15:31	TJP

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Login No. 01052940

Sample No: 01052940-4
Client ID: NWSW GW
Site: PRE-RCRA LF
Locator: MW 5
Collect Date: 22-MAY-01 12:44

Parameter	Result	Units	Date	By
SW-846 Method 8260B				
cis-1,2-Dichloroethene	13.	ug/l	24-May-01 16:00	TJP
Vinyl chloride	14.	ug/l	24-May-01 16:00	TJP

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Login No. 01052940

Sample No: 01052940-5
Client ID: NWSW GW
Site: PRE-RCRA LF
Locator: MW 6
Collect Date: 22-MAY-01 11:38

Parameter		Result	Units	Date	By
SW-846 Method 8260B					
cis-1,2-Dichloroethene	<	5.0	ug/l	24-May-01 16:30	TJP
Vinyl chloride	<	2.0	ug/l	24-May-01 16:30	TJP

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Login No. 01052940

Sample No: 01052940-6
Client ID: NWSW GW
Site: PRE-RCRA LF
Locator: MW 8
Collect Date: 22-MAY-01 14:50

Parameter		Result	Units	Date	By
SW-846 Method 8260B					
cis-1,2-Dichloroethene	<	5.0	ug/l	24-May-01 16:59	TJP
Vinyl chloride	<	2.0	ug/l	24-May-01 16:59	TJP

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PDC Cust. # : 275706

Login No. 01052940

Sample No: 01052940-7
Client ID: NWSW GW
Site: PRE-RCRA LF
Locator: MW 11
Collect Date: 22-MAY-01 13:15

Parameter	Result	Units	Date	By
SW-846 Method 8260B				
cis-1,2-Dichloroethene	73.	ug/l	24-May-01 17:29	TJP
Vinyl chloride	5.0	ug/l	24-May-01 17:29	TJP

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PDC Cust. # : 275706

Login No. 01052940

Sample No: 01052940-8
Client ID: NWSW GW
Site: PRE-RCRA LF
Locator: MW 12
Collect Date: 22-MAY-01 15:30

Parameter		Result	Units	Date	By
SW-846 Method 8260B					
cis-1,2-Dichloroethene	<	5.0	ug/l	24-May-01 17:58	TJP
Vinyl chloride	<	2.0	ug/l	24-May-01 17:58	TJP

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Date Received: 23-May-01
Date Reported: 28-Jun-01
PO #: H2 00 -63878
PDC Cust. # : 275706

Login No. 01052940

Sample No: 01052940-9
Client ID: NWSW GW
Site: PRE-RCRA LF
Locator: MW 15
Collect Date: 23-MAY-01 09:45

Parameter		Result	Units	Date	By
SW-846 Method 8260B					
cis-1,2-Dichloroethene	<	5.0	ug/l	24-May-01 18:27	TJP
Vinyl chloride	<	2.0	ug/l	24-May-01 18:27	TJP

PDC Laboratories, Inc.
P.O. Box 9071 • Peoria, IL 61612-9071
(309) 692-9688 • (800) 752-6651 • FAX (309) 692-9689

Laboratory Results

Northwestern Steel & Wire Co.
121 Wallace Street

Sterling, IL 61081

Attn: Mr. Dave Long

Date Received: 23-May-01
Date Reported: 28-Jun-01
PO #: H2 00 -63878
PDC Cust. # : 275706

Login No. 01052940

Sample No: 01052940-10
Client ID: NWSW GW
Site: PRE-RCRA LF
Locator: MW 16
Collect Date: 22-MAY-01 11:12

Parameter	Result	Units	Date	By
SW-846 Method 8260B				
cis-1,2-Dichloroethene	34.	ug/l	24-May-01 18:57	TJP
Vinyl chloride	18.	ug/l	24-May-01 18:57	TJP

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(309) 692-9688 • (800) 752-6651 • FAX (309) 692-9689

Laboratory Results

Northwestern Steel & Wire Co.
121 Wallace Street

Sterling, IL 61081

Attn: Mr. Dave Long

Date Received: 23-May-01
Date Reported: 28-Jun-01
PO #: H2 00 -63878
PDC Cust. # : 275706

Login No. 01052940

Sample No: 01052940-11
Client ID: NWSW GW
Site: PRE-RCRA LF
Locator: MW 17
Collect Date: 22-MAY-01 10:36

Parameter	Result	Units	Date	By
SW-846 Method 8260B				
cis-1,2-Dichloroethene	7.0	ug/l	24-May-01 19:26	TJP
Vinyl chloride	76.	ug/l	24-May-01 19:26	TJP

PDC Laboratories, Inc.
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(309) 692-9688 • (800) 752-6651 • FAX (309) 692-9689

Laboratory Results

Northwestern Steel & Wire Co.
121 Wallace Street

Sterling, IL 61081

Attn: Mr. Dave Long

Date Received: 23-May-01
Date Reported: 28-Jun-01
PO #: H2 00 -63878
PDC Cust. # : 275706

Login No. 01052940

Sample No: 01052940-12
Client ID: FIELD DUPLICATE
Site: PRE-RCRA LF
Locator: MW 17 DUP
Collect Date: 22-MAY-01 10:40

Parameter	Result	Units	Date	By
SW-846 Method 8260B				
cis-1,2-Dichloroethene	8.0	ug/l	24-May-01 19:55	TJP
Vinyl chloride	84.	ug/l	24-May-01 19:55	TJP

PDC Laboratories, Inc.
P.O. Box 9071 • Peoria, IL 61612-9071
(309) 692-9688 • (800) 752-6651 • FAX (309) 692-9689

Laboratory Results

Northwestern Steel & Wire Co.
121 Wallace Street

Sterling, IL 61081

Attn: Mr. Dave Long

Date Received: 23-May-01
Date Reported: 28-Jun-01
PO #: H2 00 -63878
PDC Cust. # : 275706

Login No. 01052940

Sample No: 01052940-13
Client ID: NWSW GW
Site: PRE-RCRA LF
Locator: MW 18
Collect Date: 22-MAY-01 10:10

Parameter		Result	Units	Date	By
SW-846 Method 8260B					
cis-1,2-Dichloroethene		16.	ug/l	24-May-01 20:24	TJP
Vinyl chloride	<	2.0	ug/l	24-May-01 20:24	TJP

PDC Laboratories, Inc.
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Laboratory Results

Northwestern Steel & Wire Co.
121 Wallace Street

Sterling, IL 61081

Attn: Mr. Dave Long

Date Received: 23-May-01
Date Reported: 28-Jun-01
PO #: H2 00 -63878
PDC Cust. # : 275706

Login No. 01052940

Sample No: 01052940-14
Client ID: FIELD BLANK
Site: PRE-RCRA LF
Locator: FIELD BLANK
Collect Date: 22-MAY-01 10:15

Parameter		Result	Units	Date	By
SW-846 Method 8260B					
cis-1,2-Dichloroethene	<	5.0	ug/l	25-May-01 10:39	TJP
Vinyl chloride	<	2.0	ug/l	25-May-01 10:39	TJP

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF LAND POLLUTION CONTROL
CHEMICAL ANALYSIS FORM

RECORD CODE: L P C S M 0 1 (1–7) TRANS CODE: A (8)

REPORT DUE DATE: 0 7 (36 M) / 1 5 (D) / 0 1 (Y 41)

FEDERAL ID NUMBER: _____

SITE INVENTORY NUMBER: 1 9 5 0 5 0 0 0 0 7 (9–18)

MONITOR POINT NUMBER: G 1 0 2 (See instructions) (19 H M 58)

REGION: 1 CO.: Whiteside

DATE COLLECTED: 0 5 (23 M) / 2 2 (D) / 0 1 (Y 28)

FACILITY NAME: Northwestern Steel & Wire Company Pre-RCRA Landfill

FOR IEPA USE ONLY

LAB: _____ (29)

DATE RECEIVED: _____ (42 M) _____ (D) _____ (Y 47)

BACKGROUND SAMPLE (X): _____ (54) TIME COLLECTED (24 hr clock): 1 4 (55 H) : 2 0 (M 58)

UNABLE TO COLLECT SAMPLE (See instructions): _____ (59)

MONITOR POINT SAMPLED BY (See instructions): A (60) _____ OTHER (Specify)

SAMPLE FIELD FILTERED-INORGANICS (X): _____ (61) ORGANICS(X): _____ (62)

SAMPLE APPEARANCE: T U R B I D (63–102)

COLLECTOR COMMENTS (103–142)

LAB COMMENTS (150–199)

RECORD CODE: L P C S M 0 2 (1–7) TRANS CODE: A (8) (COLUMNS 9-29 FROM ABOVE)

	FIELD MEASUREMENTS CONSTITUENT DESCRIPTION AND REQUIRED UNIT OF MEASURE	STORET NUMBER (30–34)	REMARKS See Instr. (35)	REPLICATE	< OR > (37)	VALUE (38–47)
Q	TEMP OF WATER (unfiltered F)	0 0 0 1 1				5 2 . 9
Q	SPEC COND (unfiltered umhos)	0 0 0 9 4				8 2 0 .
Q	pH (unfiltered units)	0 0 4 0 0				7 . 5 2
Q	ELEV OF GW SURF (ft ref MSL)	7 1 9 9 3				6 1 8 . 8 9
Q	DEPTH OF WATER (ft below LS)	7 2 0 1 9				2 . 4 5
A	BTM WELL ELEV (ft ref MSL)	7 2 0 2 0				6 0 7 . 2 9
Q	DEPTH TO WATER FM MEA PT (ft)	7 2 1 0 9				4 . 7 0

This Agency is authorized to require this information under Illinois Revised Statutes, 1979, chapter 111 1/2, Section 1004 and 1021. Disclosure of this information is required. Failure to do so may result in a civil penalty up to $25,000 for each day the failure continues a fine up to $1,000 and imprisonment up to one year. This form has been approved by the Forms Management Center. *Only keypunch with Data in Column 35 of Columns 38-47.*

CHEMICAL ANALYSIS FORM

IEPA/DLPC

RECORD CODE (1–7) L P C S M 0 2 TRANS CODE (8) A

SITE INVENTORY NUMBER (9–18) 1 9 5 0 5 0 0 0 0 7

MONITOR POINT NUMBER (19–22) G 1 0 2

CO. Whiteside

DATE COLLECTED (23–28) 0 5 / 2 2 / 0 1 (M / D / Y)

Northwestern Steel & Wire Company Pre-RCRA Landfill
FACILITY NAME

LAB (29) 1

	LAB MEASUREMENTS CONSTITUENT DESCRIPTION AND REQUIRED UNIT OF MEASURE	STORET NUMBER (30–34)	Rem (35)	Rep (36)	< or > (37)	Value (38–47)
	cis-1,2-Dichloroethylene	7 7 0 9 3				7
	Vinyl Chloride	3 9 1 7 5			<	2

All analytical procedures must be performed in accordance with the methods contained in "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods," SW-846, 3rd Edition, September 1986 or equivalent methods approved by the Agency. Proper sample chain of custody control and quality assurance/quality control procedures must be maintained in accordance with the facility sampling and analysis plan.

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF LAND POLLUTION CONTROL
CHEMICAL ANALYSIS FORM

RECORD CODE: P C S M 0 1 (1-7) TRANS CODE: A (8)

REPORT DUE DATE: 0 7 / 1 5 / 0 1 (M 38-39, D, Y 41)

FEDERAL ID NUMBER: _____

SITE INVENTORY NUMBER: 1 9 5 0 5 0 0 0 0 7 (9-18)

MONITOR POINT NUMBER (See instructions): G 1 0 3 (19-22)

REGION: 1 CO.: Whiteside

DATE COLLECTED: 0 5 / 2 3 / 0 1 (M 23-24, D, Y 29)

FACILITY NAME: Northwestern Steel & Wire Company Pre-RCRA Landfil

FOR IEPA USE ONLY

LAB: _____ (30)

DATE RECEIVED: _____ (M 42-43, D, Y 47)

BACKGROUND SAMPLE (X): _____ (50) TIME COLLECTED (24 hr clock): 1 8 : 5 9 (M 55-56)

UNABLE TO COLLECT SAMPLE (See instructions): _____ (50)

MONITOR POINT SAMPLED BY (See instructions): 3 (80) inertial pump (OTHER (specify))

SAMPLE FIELD FILTERED-INORGANICS (X): _____ (51) ORGANICS(X): _____ (52)

SAMPLE APPEARANCE: _____ (53-102)

COLLECTOR COMMENTS: _____ (103-142)

LAB COMMENTS: _____ (143-192)

RECORD CODE: L P C S M 0 2 (1-7) TRANS CODE: A (8) (COLUMNS 9-29 FROM ABOVE)

	FIELD MEASUREMENTS CONSTITUENT DESCRIPTION AND REQUIRED UNIT OF MEASURE	STORET NUMBER (30-34)	REMARKS See instr. (35)	REPLICATE (36)	< OR > (37)	VALUE (38-47)
Q	TEMP OF WATER (unfiltered F)	0 0 0 1 1				5 2 . 7
Q	SPEC COND (unfiltered umhos)	0 0 0 9 4				8 4 0 .
Q	pH (unfiltered units)	0 0 4 0 0				7 . 1 7
Q	ELEV OF GW SURF (ft ref MSL)	7 1 9 9 3				6 1 4 . 5 3
Q	DEPTH OF WATER (ft below LS)	7 2 0 1 9				1 3 . 1 9
A	BTM WELL ELEV (ft ref MSL)	7 2 0 2 0				5 8 5 . 3 0
Q	DEPTH TO WATER FM MEA PT (ft)	7 2 1 0 9				1 2 . 9 9

Agency is authorized to require this information under Illinois Revised Statutes, 1979, chapter 111 1/2, Section 1004 and 1021. Disclosure of this information is required. Failure to do so may result in a civil penalty up to $25,000 for each day the failure continues a fine up to $1,000 and imprisonment up to one year. This form has been approved by the Forms Management Center. *Only keypunch with Data in Column 35 of Columns 38-47.*

CHEMICAL ANALYSIS FORM

IEPA/DLPC

RECORD CODE [L|P|C|S|M|0|2] TRANS CODE [A]

SITE INVENTORY NUMBER 1 9 5 0 5 0 0 0 0 7

MONITOR POINT NUMBER G 1 0 3

CO. Whiteside

DATE COLLECTED 0 5 / 2 3 / 0 1

Northwestern Steel & Wire Company Pre-RCRA Landfill
FACILITY NAME

LAB 1

	LAB MEASUREMENTS CONSTITUENT DESCRIPTION AND REQUIRED UNIT OF MEASURE	STORET NUMBER	Rem	Rep	< or >	Value
	cis-1,2-Dichloroethylene	77093			<	32.
	Vinyl Chloride	39175				160.
						1
						1

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ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF LAND POLLUTION CONTROL
CHEMICAL ANALYSIS FORM

RECORD CODE: L P C S M 0 1 (1–7) TRANS CODE: A (8)

REPORT DUE DATE: 07 (36 M) / 15 (D) / 01 (Y 41)

FEDERAL ID NUMBER

SITE INVENTORY NUMBER: 1 9 5 0 5 0 0 0 0 7 (9–18)

MONITOR POINT NUMBER: G 1 0 4 (See instructions) (19 H M 58)

REGION: 1 CO.: Whiteside

DATE COLLECTED: 05 (23 M) / 23 (D) / 01 (Y 28)

FACILITY NAME: Northwestern Steel & Wire Company Pre-RCRA Landfill

FOR IEPA USE ONLY

LAB (29)

DATE RECEIVED (42 M, D, Y 47)

BACKGROUND SAMPLE (X) (54) TIME COLLECTED (24 hr clock): 08 (55 H) : 25 (M 58)

UNABLE TO COLLECT SAMPLE (See instructions) (59)

MONITOR POINT SAMPLED BY (See instructions): 3 (60) inertial pump (OTHER (Specify))

SAMPLE FIELD FILTERED-INORGANICS (X) (61) ORGANICS(X) (62)

SAMPLE APPEARANCE (63–102)

COLLECTOR COMMENTS (103–142)

LAB COMMENTS (150–199)

RECORD CODE: L P C S M 0 2 (1–7) TRANS CODE: A (8) (COLUMNS 9-29 FROM ABOVE)

	FIELD MEASUREMENTS CONSTITUENT DESCRIPTION AND REQUIRED UNIT OF MEASURE	STORET NUMBER (30–34)	REMARKS See Instr. (35)	REPLICATE	< OR > (37)	VALUE (38–47)
Q	TEMP OF WATER (unfiltered F)	00011				52.2
Q	SPEC COND (unfiltered umhos)	00094				840.
Q	pH (unfiltered units)	00400				7.21
Q	ELEV OF GW SURF (ft ref MSL)	71993				615.99
Q	DEPTH OF WATER (ft below LS)	72019				12.05
A	BTM WELL ELEV (ft ref MSL)	72020				586.03
Q	DEPTH TO WATER FM MEA PT (ft)	72109				11.73

This Agency is authorized to require this information under Illinois Revised Statutes, 1979, chapter 111 1/2, Section 1004 and 1021. Disclosure of this information is required. Failure to do so may result in a civil penalty up to $25,000 for each day the failure continues a fine up to $1,000 and imprisonment up to one year. This form has been approved by the Forms Management Center. *Only keypunch with Data in Column 35 of Columns 38-47.*

CHEMICAL ANALYSIS FORM

IEPA/DLPC

RECORD CODE L P C S M 0 2 (1–7) TRANS CODE A (8)

SITE INVENTORY NUMBER 1 9 5 0 5 0 0 0 0 7 (9–18) MONITOR POINT NUMBER G 1 0 4 (19–22)

CO. Whiteside

DATE COLLECTED 0 5 / 2 3 / 0 1 (23 M, D, Y, 28)

Northwestern Steel & Wire Company Pre-RCRA Landfill
FACILITY NAME

LAB 1 (29)

	LAB MEASUREMENTS CONSTITUENT DESCRIPTION AND REQUIRED UNIT OF MEASURE	STORET NUMBER	Rem	Rep	< or >	Value
	cis-1,2-Dichloroethylene	7 7 0 9 3 (30–34)	(35)	(36)	< (37)	(38–47)
	Vinyl Chloride	3 9 1 7 5				6 6 .

All analytical procedures must be performed in accordance with the methods contained in "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods," SW-846, 3rd Edition, September 1986 or equivalent methods approved by the Agency. Proper sample chain of custody control and quality assurance/quality control procedures must be maintained in accordance with the facility sampling and analysis plan.

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF LAND POLLUTION CONTROL
CHEMICAL ANALYSIS FORM

RECORD CODE: LPCSM01 (1–7) TRANS CODE: A (8)

REPORT DUE DATE (36 M) 07 / (D) 15 / (Y 41) 01

FEDERAL ID NUMBER _ _ _ _ _ _ _ _ _ _ _ _

SITE INVENTORY NUMBER (9–18) 1 9 5 0 5 0 0 0 0 7

MONITOR POINT NUMBER (See instructions) (19 H, M 58) G105

REGION 1 CO. Whiteside

DATE COLLECTED (23 M) 05 / (D) 22 / (Y 28) 01

FACILITY NAME Northwestern Steel & Wire Company Pre-RCRA Landfill

FOR IEPA USE ONLY

LAB (29)

DATE RECEIVED (42 M, D, Y 47)

BACKGROUND SAMPLE (X) (54) TIME COLLECTED (24 hr clock) (55 H, M 58) 12:44

UNABLE TO COLLECT SAMPLE (See instructions) (59)

MONITOR POINT SAMPLED BY (See instructions) (60) 3 inertial pump (OTHER (Specify))

SAMPLE FIELD FILTERED-INORGANICS (X) (61) ORGANICS(X) (62)

SAMPLE APPEARANCE (63–102)

COLLECTOR COMMENTS (103–142)

LAB COMMENTS (150–199)

RECORD CODE LP CSM02 (1–7) TRANS CODE A (8) (COLUMNS 9-29 FROM ABOVE)

	FIELD MEASUREMENTS CONSTITUENT DESCRIPTION AND REQUIRED UNIT OF MEASURE	STORET NUMBER (30–34)	REMARKS See Instr. (35)	REPLICATE	< OR > (37)	VALUE (38–47)
Q	TEMP OF WATER (unfiltered F)	00011				55.9
Q	SPEC COND (unfiltered umhos)	00094				830.
Q	pH (unfiltered units)	00400				7.24
Q	ELEV OF GW SURF (ft ref MSL)	71993				616.12
Q	DEPTH OF WATER (ft below LS)	72019				11.24
A	BTM WELL ELEV (ft ref MSL)	72020				578.69
Q	DEPTH TO WATER FM MEA PT (ft)	72109				10.90

This Agency is authorized to require this information under Illinois Revised Statutes, 1979, chapter 111 1/2, Section 1004 and 1021. Disclosure of this information is required. Failure to do so may result in a civil penalty up to $25,000 for each day the failure continues a fine up to $1,000 and imprisonment up to one year. This form has been approved by the Forms Management Center. *Only keypunch with Data in Column 35 of Columns 38-47.*

CHEMICAL ANALYSIS FORM

IEPA/DLPC

RECORD CODE L P C S M 0 2 (1–7)

TRANS CODE A (8)

SITE INVENTORY NUMBER 1 9 5 0 5 0 0 0 0 7 (9–18)

MONITOR POINT NUMBER G 1 0 5 (19–22)

CO. Whiteside

DATE COLLECTED 0 5 / 2 2 / 0 1 (23–28: M / D / Y)

Northwestern Steel & Wire Company Pre-RCRA Landfill
FACILITY NAME

LAB 1 (29)

	LAB MEASUREMENTS CONSTITUENT DESCRIPTION AND REQUIRED UNIT OF MEASURE	STORET NUMBER	Rem	Rep	< or >	Value
	cis-1,2-Dichloroethylene	7 7 0 9 3 (30–34)	(35)	(36)	(37)	1 3 . (38–47)
	Vinyl Chloride	3 9 1 7 5				1 4 .
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All analytical procedures must be performed in accordance with the methods contained in "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods," SW-846, 3rd Edition, September 1986 or equivalent methods approved by the Agency. Proper sample chain of custody control and quality assurance/quality control procedures must be maintained in accordance with the facility sampling and analysis plan.

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF LAND POLLUTION CONTROL
CHEMICAL ANALYSIS FORM

RECORD CODE: L P C S M 0 1 (1–7) TRANS CODE: A (8)

REPORT DUE DATE: 07 / 15 / 01 (36 M / D / Y 41)

FEDERAL ID NUMBER: _____

SITE INVENTORY NUMBER: 1 9 5 0 5 0 0 0 0 7 (9–18)

MONITOR POINT NUMBER (See instructions): G 1 0 6 (19 H M 58)

REGION: 1 CO.: Whiteside

DATE COLLECTED: 05 / 22 / 01 (23 M / D / Y 28)

FACILITY NAME: Northwestern Steel & Wire Company Pre-RCRA Landfill

FOR IEPA USE ONLY

LAB: _____ (29)

DATE RECEIVED: _____ (42 M / D / Y 47)

BACKGROUND SAMPLE (X): _____ (54) TIME COLLECTED (24 hr clock): 11 : 38 (55 H M 58)

UNABLE TO COLLECT SAMPLE (See instructions): _____ (59)

MONITOR POINT SAMPLED BY (See instructions): 3 (60) inertial pump (OTHER (Specify))

SAMPLE FIELD FILTERED-INORGANICS (X): _____ (61) ORGANICS(X): _____ (62)

SAMPLE APPEARANCE: (63–102)

COLLECTOR COMMENTS: (103–142)

LAB COMMENTS: (150–199)

RECORD CODE: L P C S M 0 2 (1–7) TRANS CODE: A (8) (COLUMNS 9-29 FROM ABOVE)

	FIELD MEASUREMENTS CONSTITUENT DESCRIPTION AND REQUIRED UNIT OF MEASURE	STORET NUMBER (30–34)	REMARKS See Instr. (35)	REPLICATE	< OR > (37)	VALUE (38–47)
Q	TEMP OF WATER (unfiltered F)	00011				54.7
Q	SPEC COND (unfiltered umhos)	00094				720.
Q	pH (unfiltered units)	00400				7.34
Q	ELEV OF GW SURF (ft ref MSL)	71993				615.22
Q	DEPTH OF WATER (ft below LS)	72019				11.42
A	BTM WELL ELEV (ft ref MSL)	72020				590.56
Q	DEPTH TO WATER FM MEA PT (ft)	72109				11.19

This Agency is authorized to require this information under Illinois Revised Statutes, 1979, chapter 111 1/2, Section 1004 and 1021. Disclosure of this information is required. Failure to do so may result in a civil penalty up to $25,000 for each day the failure continues a fine up to $1,000 and imprisonment up to one year. This form has been approved by the Forms Management Center. *Only keypunch with Data in Column 35 of Columns 38-47.*

CHEMICAL ANALYSIS FORM

IEPA/DLPC

RECORD CODE L P C S M 0 2 (1–7) TRANS CODE A (8)

SITE INVENTORY NUMBER 1 9 5 0 5 0 0 0 0 7 (9–18) MONITOR POINT NUMBER G 1 0 5 (19–22)

CO. Whiteside DATE COLLECTED 0 5 / 2 2 / 0 1 (23 M, D, Y, 28)

Northwestern Steel & Wire Company Pre-RCRA Landfill
FACILITY NAME

LAB 1 (29)

	LAB MEASUREMENTS CONSTITUENT DESCRIPTION AND REQUIRED UNIT OF MEASURE	STORET NUMBER	Rem (35)	Rep (36)	< or > (37)	Value (38–47)
	cis-1,2-Dichloroethylene	77093 (30–34)			<	5
	Vinyl Chloride	39175			<	2

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ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF LAND POLLUTION CONTROL
CHEMICAL ANALYSIS FORM

RECORD CODE: L P C S M 0 1 (1–7) TRANS CODE: A (8)

REPORT DUE DATE: 0 7 (36 M) / 1 5 (D) / 0 1 (Y 41)

FEDERAL ID NUMBER: _ _ _ _ _ _ _ _ _ _ _ _

SITE INVENTORY NUMBER: 1 9 5 0 5 0 0 0 0 7 (9–18)

MONITOR POINT NUMBER (See instructions): G 1 0 8 (19 H M 58)

REGION: 1 CO.: Whiteside

DATE COLLECTED: 0 5 (23 M) / 2 2 (D) / 0 1 (Y 28)

FACILITY NAME: Northwestern Steel & Wire Company Pre-RCRA Landfill

FOR IEPA USE ONLY

LAB: _ (29)

DATE RECEIVED: _ _ (42 M) _ _ (D) _ _ (Y 47)

BACKGROUND SAMPLE (X): _ (54) TIME COLLECTED (24 hr clock): 1 5 (55 H) : 0 0 (M 58)

UNABLE TO COLLECT SAMPLE (See instructions): _ (59)

MONITOR POINT SAMPLED BY (See instructions): 3 (60) inertial pump (OTHER (Specify))

SAMPLE FIELD FILTERED-INORGANICS (X): _ (61) ORGANICS(X): _ (62)

SAMPLE APPEARANCE: T U R B I D (63–102)

COLLECTOR COMMENTS (103–142)

LAB COMMENTS (150–199)

RECORD CODE: L P C S M 0 2 (1–7) TRANS CODE: A (8) (COLUMNS 9-29 FROM ABOVE)

	FIELD MEASUREMENTS CONSTITUENT DESCRIPTION AND REQUIRED UNIT OF MEASURE	STORET NUMBER	REMARKS See Instr.	REPLICATE	< OR >	VALUE
Q	TEMP OF WATER (unfiltered F)	0 0 0 1 1 (30–34)	_ (35)	_	_ (37)	5 2 . 3 (38–47)
Q	SPEC COND (unfiltered umhos)	0 0 0 9 4	_	_	_	7 4 0 .
Q	pH (unfiltered units)	0 0 4 0 0	_	_	_	7 . 3 1
Q	ELEV OF GW SURF (ft ref MSL)	7 1 9 9 3	_	_	_	6 1 6 . 2 9
Q	DEPTH OF WATER (ft below LS)	7 2 0 1 9	_	_	_	4 . 4 2
A	BTM WELL ELEV (ft ref MSL)	7 2 0 2 0	_	_	_	5 5 7 . 4 2
Q	DEPTH TO WATER FM MEA PT (ft)	7 2 1 0 9	_	_	_	6 . 3 1

This Agency is authorized to require this information under Illinois Revised Statutes, 1979, chapter 111 1/2, Section 1004 and 1021. Disclosure of this information is required. Failure to do so may result in a civil penalty up to $25,000 for each day the failure continues a fine up to $1,000 and imprisonment up to one year. This form has been approved by the Forms Management Center. *Only keypunch with Data in Column 35 of Columns 38-47.*

CHEMICAL ANALYSIS FORM

IEPA/DLPC

RECORD CODE L P C S M 0 2 (1–7) TRANS CODE A (8)

SITE INVENTORY NUMBER 1 9 5 0 5 0 0 0 0 7 (9–18) MONITOR POINT NUMBER G 1 0 8 (19–22)

CO. Whiteside

DATE COLLECTED 0 5 / 2 2 / 0 1 (23 M, D, Y, 28)

Northwestern Steel & Wire Company Pre-RCRA Landfill
FACILITY NAME

LAB 1 (29)

	LAB MEASUREMENTS CONSTITUENT DESCRIPTION AND REQUIRED UNIT OF MEASURE	STORET NUMBER	Rem	Rep	< or >	Value
	cis-1,2-Dichloroethylene	7 7 0 9 3 (30–34)	(35)	(36)	< (37)	5 . (38–47)
	Vinyl Chloride	3 9 1 7 5			<	2 .
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All analytical procedures must be performed in accordance with the methods contained in "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods," SW-846, 3rd Edition, September 1986 or equivalent methods approved by the Agency. Proper sample chain of custody control and quality assurance/quality control procedures must be maintained in accordance with the facility sampling and analysis plan.

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF LAND POLLUTION CONTROL
CHEMICAL ANALYSIS FORM

RECORD CODE: L P C S M 0 1 (1–7) | TRANS CODE: A (8)

REPORT DUE DATE: 0 7 (36 M) / 1 5 (D) / 0 1 (Y 41)

FEDERAL ID NUMBER: _____

SITE INVENTORY NUMBER: 1 9 5 0 5 0 0 0 0 7 (9–18)

MONITOR POINT NUMBER: G 1 1 1 (19 H, M 58) (See instructions)

REGION: 1 CO.: Whiteside

DATE COLLECTED: 0 5 (23 M) / 2 2 (D) / 0 1 (Y 28)

FACILITY NAME: Northwestern Steel & Wire Company Pre-RCRA Landfill

FOR IEPA USE ONLY

LAB: _____ (29)

DATE RECEIVED: _____ (42 M, D, Y 47)

BACKGROUND SAMPLE (X): _____ (54) TIME COLLECTED: 1 3 (55 H) : 1 5 (M 58) (24 hr clock)

UNABLE TO COLLECT SAMPLE: _____ (59) (See instructions)

MONITOR POINT SAMPLED BY: A (60) (See instructions) _____ OTHER (Specify)

SAMPLE FIELD FILTERED-INORGANICS (X): _____ (61) ORGANICS(X): _____ (62)

SAMPLE APPEARANCE: T U R B I D B L A C K (63–102)

COLLECTOR COMMENTS: (103–142)

LAB COMMENTS: (150–199)

RECORD CODE: L P C S M 0 2 (1–7) | TRANS CODE: A (8) (COLUMNS 9-29 FROM ABOVE)

	FIELD MEASUREMENTS CONSTITUENT DESCRIPTION AND REQUIRED UNIT OF MEASURE	STORET NUMBER	REMARKS See Instr.	REPLICATE	< OR >	VALUE
Q	TEMP OF WATER (unfiltered F)	0 0 0 1 1 (30–34)	(35)		(37)	5 2 . 3 (38–47)
Q	SPEC COND (unfiltered umhos)	0 0 0 9 4				8 2 0 .
Q	pH (unfiltered units)	0 0 4 0 0				7 . 2 1
Q	ELEV OF GW SURF (ft ref MSL)	7 1 9 9 3				6 1 7 . 8 1
Q	DEPTH OF WATER (ft below LS)	7 2 0 1 9				3 . 2 5
A	BTM WELL ELEV (ft ref MSL)	7 2 0 2 0				6 0 6 . 7 9
Q	DEPTH TO WATER FM MEA PT (ft)	7 2 1 0 9				5 . 4 0

This Agency is authorized to require this information under Illinois Revised Statutes, 1979, chapter 111 1/2, Section 1004 and 1021. Disclosure of this information is required. Failure to do so may result in a civil penalty up to $25,000 for each day the failure continues a fine up to $1,000 and imprisonment up to one year. This form has been approved by the Forms Management Center. *Only keypunch with Data in Column 35 of Columns 38-47.*

CHEMICAL ANALYSIS FORM

IEPA/DLPC

RECORD CODE L P C S M 0 2 (1–7) TRANS CODE A (8)

SITE INVENTORY NUMBER 1 9 5 0 5 0 0 0 0 7 (9–18) MONITOR POINT NUMBER G 1 1 1 (19–22)

CO. Whiteside

DATE COLLECTED 0 5 / 2 2 / 0 1 (23 M, O, Y, 28)

Northwestern Steel & Wire Company Pre-RCRA Landfill
FACILITY NAME

LAB 1 (29)

	LAB MEASUREMENTS CONSTITUENT DESCRIPTION AND REQUIRED UNIT OF MEASURE	STORET NUMBER	Rem	Rep	< or >	Value
	cis-1,2-Dichloroethylene	7 7 0 9 3 (30–34)	(35)	(36)	(37)	7 3 . (38–47)
	Vinyl Chloride	3 9 1 7 5				5 .

All analytical procedures must be performed in accordance with the methods contained in "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods," SW-846, 3rd Edition, September 1986 or equivalent methods approved by the Agency. Proper sample chain of custody control and quality assurance/quality control procedures must be maintained in accordance with the facility sampling and analysis plan.

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF LAND POLLUTION CONTROL
CHEMICAL ANALYSIS FORM

RECORD CODE: L P C S M 0 1 (1–7) TRANS CODE: A (8)

REPORT DUE DATE: 07 / 15 / 01 (36 M, D, Y 41)

FEDERAL ID NUMBER: _____

SITE INVENTORY NUMBER: 1 9 5 0 5 0 0 0 0 7 (9–18)

MONITOR POINT NUMBER (See instructions): G 1 1 2 (19 H, M 58)

REGION: 1 CO.: Whiteside

DATE COLLECTED: 05 / 22 / 01 (23 M, D, Y 28)

FACILITY NAME: Northwestern Steel & Wire Company Pre-RCRA Landfill

FOR IEPA USE ONLY

LAB: _____ (29)

DATE RECEIVED: ____ (42 M) ____ (D) ____ (Y 47)

BACKGROUND SAMPLE (X): _____ (54) TIME COLLECTED (24 hr clock): 15 : 30 (55 H, M 58)

UNABLE TO COLLECT SAMPLE (See instructions): _____ (59)

MONITOR POINT SAMPLED BY (See instructions): A (60) _____ OTHER (Specify)

SAMPLE FIELD FILTERED-INORGANICS (X): _____ (61) ORGANICS(X): _____ (62)

SAMPLE APPEARANCE: (63–102)

COLLECTOR COMMENTS: (103–142)

LAB COMMENTS: (150–199)

RECORD CODE: L P C S M 0 2 (1–7) TRANS CODE: A (8) (COLUMNS 9-29 FROM ABOVE)

	FIELD MEASUREMENTS CONSTITUENT DESCRIPTION AND REQUIRED UNIT OF MEASURE	STORET NUMBER (30–34)	REMARKS See Instr. (35)	REPLICATE (36)	< OR > (37)	VALUE (38–47)
Q	TEMP OF WATER (unfiltered F)	00011				51.8
Q	SPEC COND (unfiltered umhos)	00094				730.
Q	pH (unfiltered units)	00400				7.28
Q	ELEV OF GW SURF (ft ref MSL)	71993				615.64
Q	DEPTH OF WATER (ft below LS)	72019				7.35
A	BTM WELL ELEV (ft ref MSL)	72020				608.18
Q	DEPTH TO WATER FM MEA PT (ft)	72109				9.40

The Agency is authorized to require this information under Illinois Revised Statutes, 1979, chapter 111 1/2, Section 1004 and 1021. Disclosure of this information is required. Failure to do so may result in a civil penalty up to $25,000 for each day the failure continues a fine up to $1,000 and imprisonment up to one year. This form has been approved by the Forms Management Center. *Only keypunch with Data in Column 35 of Columns 38-47.*

CHEMICAL ANALYSIS FORM

IEPA/DLPC

RECORD CODE (1–7) L P C S M 0 2 | TRANS CODE (8) A

SITE INVENTORY NUMBER (9–18) 1 9 5 0 5 0 0 0 0 7 | MONITOR POINT NUMBER (19–22) G 1 1 2

CO. Whiteside

DATE COLLECTED (23–28) 0 5 / 2 2 / 0 1

Northwestern Steel & Wire Company Pre-RCRA Landfill
FACILITY NAME

LAB (29) 1

	LAB MEASUREMENTS CONSTITUENT DESCRIPTION AND REQUIRED UNIT OF MEASURE	STORET NUMBER (30–34)	Rem (35)	Rep (36)	< or > (37)	Value (38–47)
	cis-1,2-Dichloroethylene	7 7 0 9 3			<	5 .
	Vinyl Chloride	3 9 1 7 5			<	2 .
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All analytical procedures must be performed in accordance with the methods contained in "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods," SW-846, 3rd Edition, September 1986 or equivalent methods approved by the Agency. Proper sample chain of custody control and quality assurance/quality control procedures must be maintained in accordance with the facility sampling and analysis plan.

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF LAND POLLUTION CONTROL
CHEMICAL ANALYSIS FORM

RECORD CODE: L P C S M 0 1 (1–7) TRANS CODE: A (8)

REPORT DUE DATE: 07 (36 M) / 15 (D) / 01 (Y 41)

FEDERAL ID NUMBER: _____

SITE INVENTORY NUMBER: 1 9 5 0 5 0 0 0 0 7 (9–18)

MONITOR POINT NUMBER (See instructions): G 1 1 5 (19 H, M, 58)

REGION: 1 CO.: Whiteside

DATE COLLECTED: 05 (23 M) / 23 (D) / 01 (Y 28)

FACILITY NAME: Northwestern Steel & Wire Company Pre-RCRA Landfill

FOR IEPA USE ONLY

LAB: _____ (29)

DATE RECEIVED: ____ (42 M) ____ (D) ____ (Y 47)

BACKGROUND SAMPLE (X): _____ (54) TIME COLLECTED (24 hr clock): 09 (55 H) : 45 (M 58)

UNABLE TO COLLECT SAMPLE (See instructions): _____ (59)

MONITOR POINT SAMPLED BY (See instructions): A (60) _____ OTHER (Specify)

SAMPLE FIELD FILTERED-INORGANICS (X): _____ (61) ORGANICS(X): _____ (62)

SAMPLE APPEARANCE: ORANGE (63–102)

COLLECTOR COMMENTS: (103–142)

LAB COMMENTS: (150–199)

RECORD CODE: L P C S M 0 2 (1–7) TRANS CODE: A (8) (COLUMNS 9-29 FROM ABOVE)

	FIELD MEASUREMENTS CONSTITUENT DESCRIPTION AND REQUIRED UNIT OF MEASURE	STORET NUMBER	REMARKS See Instr.	REPLICATE	< OR >	VALUE
Q	TEMP OF WATER (unfiltered F)	00011 (30–34)	(35)		(37)	52.3 (38–47)
Q	SPEC COND (unfiltered umhos)	00094				890.
Q	pH (unfiltered units)	00400				7.03
Q	ELEV OF GW SURF (ft ref MSL)	71993				614.89
Q	DEPTH OF WATER (ft below LS)	72019				13.12
A	BTM WELL ELEV (ft ref MSL)	72020				603.73
Q	DEPTH TO WATER FM MEA PT (ft)	72109				12.87

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CHEMICAL ANALYSIS FORM

IEPA/DLPC

RECORD CODE (1–7) L P C S M 0 2 TRANS CODE (8) A

SITE INVENTORY NUMBER (9–18) 1 9 5 0 5 0 0 0 0 7

MONITOR POINT NUMBER (19–22) G 1 1 5

CO. Whiteside

DATE COLLECTED (23 M / D / Y 28) 0 5 / 2 3 / 0 1

Northwestern Steel & Wire Company Pre-RCRA Landfill
FACILITY NAME

LAB (29) 1

	LAB MEASUREMENTS CONSTITUENT DESCRIPTION AND REQUIRED UNIT OF MEASURE	STORET NUMBER (30–34)	Rem (35)	Rep (36)	< or > (37)	Value (38–47)
	cis-1,2-Dichloroethylene	7 7 0 9 3			<	5
	Vinyl Chloride	3 9 1 7 5			<	2

All analytical procedures must be performed in accordance with the methods contained in "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods," SW-846, 3rd Edition, September 1986 or equivalent methods approved by the Agency. Proper sample chain of custody control and quality assurance/quality control procedures must be maintained in accordance with the facility sampling and analysis plan.

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF LAND POLLUTION CONTROL
CHEMICAL ANALYSIS FORM

RECORD CODE: L P C S M 0 1 (1–7) TRANS CODE: A (8)

REPORT DUE DATE: 07 / 15 / 01 (36–41)

FEDERAL ID NUMBER: _____

SITE INVENTORY NUMBER: 1 9 5 0 5 0 0 0 0 7 (9–18)

MONITOR POINT NUMBER (See instructions): G 1 1 6 (19–22)

REGION: 1 CO.: Whiteside

DATE COLLECTED: 05 / 22 / 01 (25–30)

FACILITY NAME: Northwestern Steel & Wire Company Pre-RCRA Landfill

FOR IEPA USE ONLY

LAB: _____ (30)

DATE RECEIVED: _____ (42–47)

BACKGROUND SAMPLE (X): _____ (48) TIME COLLECTED (24 hr clock): 11 : 12 (33–36)

UNABLE TO COLLECT SAMPLE (See instructions): _____ (49)

MONITOR POINT SAMPLED BY (See instructions): 3 (50) inertial pump (OTHER (Specify))

SAMPLE FIELD FILTERED-INORGANICS (X): _____ (51) ORGANICS(X): _____ (52)

SAMPLE APPEARANCE: _____ (42–102)

COLLECTOR COMMENTS: _____ (103–142)

LAB COMMENTS: _____ (150–199)

RECORD CODE: L P C S M 0 2 (1–7) TRANS CODE: A (8) (COLUMNS 9-29 FROM ABOVE)

	FIELD MEASUREMENTS CONSTITUENT DESCRIPTION AND REQUIRED UNIT OF MEASURE	STORET NUMBER	REMARKS See Instr.	REPLICATE	< OR >	VALUE
Q	TEMP OF WATER (unfiltered F)	00011 (30–34)				55.8 (38–47)
Q	SPEC COND (unfiltered umhos)	00094				810.
Q	pH (unfiltered units)	00400				7.03
Q	ELEV OF GW SURF (ft ref MSL)	71993				614.05
Q	DEPTH OF WATER (ft below LS)	72019				12.80
A	BTM WELL ELEV (ft ref MSL)	72020				578.50
Q	DEPTH TO WATER FM MEA PT (ft)	72109				12.55

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CHEMICAL ANALYSIS FORM

IEPA/DLPC

RECORD CODE L P C S M 0 2 (1–7)

TRANS CODE A (8)

SITE INVENTORY NUMBER 1 9 5 0 5 0 0 0 0 7 (9–18)

MONITOR POINT NUMBER G 1 1 6 (19–22)

CO. Whiteside

DATE COLLECTED 0 5 / 2 2 / 0 1 (23–28)

Northwestern Steel & Wire Company Pre-RCRA Landfill
FACILITY NAME

LAB 1 (29)

	LAB MEASUREMENTS CONSTITUENT DESCRIPTION AND REQUIRED UNIT OF MEASURE	STORET NUMBER	Rem	Rep	< or >	Value
	cis-1,2-Dichloroethylene	77093 (30–34)	(35)	(36)	(37)	34. (38–47)
	Vinyl Chloride	39175				18.

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ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF LAND POLLUTION CONTROL
CHEMICAL ANALYSIS FORM

RECORD CODE: LPCSM01 (1–7) TRANS CODE: A (8)

REPORT DUE DATE 07 (36 M) / 15 (D) / 01 (Y 41)

FEDERAL ID NUMBER

SITE INVENTORY NUMBER 1950500007 (9–18)

MONITOR POINT NUMBER G117 (See instructions) (19 H, M 58)

REGION 1 CO. Whiteside

DATE COLLECTED 05 (23 M) / 22 (D) / 01 (Y 28)

FACILITY NAME Northwestern Steel & Wire Company Pre-RCRA Landfill

FOR IEPA USE ONLY

LAB (29)

DATE RECEIVED (42 M, D, Y 47)

BACKGROUND SAMPLE (X) (54) TIME COLLECTED 10 (55 H) : 36 (M 58) (24 hr clock)

UNABLE TO COLLECT SAMPLE (See instructions) (59)

MONITOR POINT SAMPLED BY 3 (See instructions) (60) inertial pump (OTHER (Specify))

SAMPLE FIELD FILTERED-INORGANICS (X) (61) ORGANICS(X) (62)

SAMPLE APPEARANCE (63–102)

COLLECTOR COMMENTS (103–142)

LAB COMMENTS (150–199)

RECORD CODE LPCSM02 (1–7) TRANS CODE A (8) (COLUMNS 9-29 FROM ABOVE)

	FIELD MEASUREMENTS CONSTITUENT DESCRIPTION AND REQUIRED UNIT OF MEASURE	STORET NUMBER (30–34)	REMARKS See Instr. (35)	REPLICATE	< OR > (37)	VALUE (38–47)
Q	TEMP OF WATER (unfiltered F)	00011				55.4
Q	SPEC COND (unfiltered umhos)	00094				880.
Q	pH (unfiltered units)	00400				7.15
Q	ELEV OF GW SURF (ft ref MSL)	71993				613.83
Q	DEPTH OF WATER (ft below LS)	72019				12.58
A	BTM WELL ELEV (ft ref MSL)	72020				590.72
Q	DEPTH TO WATER FM MEA PT (ft)	72109				11.14

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CHEMICAL ANALYSIS FORM

IEPA/DLPC

RE[redacted]D CODE L P C S M 0 2 (1–7) TRANS CODE A (6)

SITE INVENTORY NUMBER 1 9 5 0 5 0 0 0 0 7 (9–18) MONITOR POINT NUMBER G 1 1 7 (19–22)

CO. Whiteside

DATE COLLECTED 0 5 (23–M) / 2 2 (D) / 0 1 (Y–28)

Northwestern Steel & Wire Company Pre-RCRA Landfill
FACILITY NAME

LAB 1 (29)

	LAB MEASUREMENTS CONSTITUENT DESCRIPTION AND REQUIRED UNIT OF MEASURE	STORET NUMBER	Rem	Rep	< or >	Value
	cis-1,2-Dichloroethylene	7 7 0 9 3 (30–34)	(35)	(36)	(37)	(38) 7 . (47)
	Vinyl Chloride	3 9 1 7 5				7 6 .
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All analytical procedures must be performed in accordance with the methods contained in "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods," SW-846, 3rd Edition, September 1986 or equivalent methods approved by the Ag[redacted] Proper sample chain of custody control and quality assurance/quality control procedures must be maintained in accordance with the facility sampling and analysis plan.

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF LAND POLLUTION CONTROL
CHEMICAL ANALYSIS FORM

RECORD CODE: LPCSM01 (1–7) TRANS CODE: A (8)

REPORT DUE DATE: 07 (38 M) / 15 (D) / 01 (Y 41)

FEDERAL ID NUMBER: _____

SITE INVENTORY NUMBER: 1 9 5 0 5 0 0 0 0 7 (9–18)

MONITOR POINT NUMBER (See instructions): G118 (19 H M 58)

REGION: 1 CO.: Whiteside

DATE COLLECTED: 05 (23 M) / 22 (D) / 01 (Y 28)

FACILITY NAME: Northwestern Steel & Wire Company Pre-RCRA Landfill

FOR IEPA USE ONLY

LAB: _____ (29)

DATE RECEIVED: _____ (42 M) _____ (D) _____ (Y 47)

BACKGROUND SAMPLE (X): _____ (54) TIME COLLECTED (24 hr clock): 10 (55 H) : 10 (M 58)

UNABLE TO COLLECT SAMPLE (See instructions): _____ (59)

MONITOR POINT SAMPLED BY (See instructions): 3 (60) inertial pump (OTHER (Specify))

SAMPLE FIELD FILTERED-INORGANICS (X): _____ (61) ORGANICS(X): _____ (62)

SAMPLE APPEARANCE (63–102)

COLLECTOR COMMENTS (103–142)

LAB COMMENTS (150–199)

RECORD CODE: LPCSM02 (1–7) TRANS CODE: A (8) (COLUMNS 9-29 FROM ABOVE)

	FIELD MEASUREMENTS CONSTITUENT DESCRIPTION AND REQUIRED UNIT OF MEASURE	STORET NUMBER (30–34)	REMARKS See Instr. (35)	REPLICATE	< OR > (37)	VALUE (38–47)
Q	TEMP OF WATER (unfiltered F)	00011				55.0
Q	SPEC COND (unfiltered umhos)	00094				750.
Q	pH (unfiltered units)	00400				7.14
Q	ELEV OF GW SURF (ft ref MSL)	71993				614.14
Q	DEPTH OF WATER (ft below LS)	72019				11.33
A	BTM WELL ELEV (ft ref MSL)	72020				601.97
Q	DEPTH TO WATER FM MEA PT (ft)	72109				13.88

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CHEMICAL ANALYSIS FORM

IEPA/DLPC

RECORD CODE (1–7) L P C S M 0 2 — TRANS CODE (8) A

SITE INVENTORY NUMBER (9–18) 1 9 5 0 5 0 0 0 0 7

MONITOR POINT NUMBER (19–22) G 1 1 8

CO. Whiteside

DATE COLLECTED (23–28) 0 5 / 2 2 / 0 1 (M / D / Y)

Northwestern Steel & Wire Company Pre-RCRA Landfill
FACILITY NAME

LAB (29) 1

*	LAB MEASUREMENTS CONSTITUENT DESCRIPTION AND REQUIRED UNIT OF MEASURE	STORET NUMBER (30–34)	Rem (35)	Rep (36)	< or > (37)	Value (38–47)
	cis-1,2-Dichloroethylene	7 7 0 9 3				1 6 .
	Vinyl Chloride	3 9 1 7 5			<	2 .
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PDC LABORATORIES, INC.
2231 WEST ALTORFER DRIVE
PEORIA, IL 61615

PHONE # 309-692-9688
FAX # 309-692-9689

CHAIN OF CUSTODY RECORD

ALL SHADED AREAS MUST BE COMPLETED BY CLIENT (PLEASE PRINT)

(1) CLIENT	PROJECT NUMBER	P.O. NUMBER	MEANS SHIPPED
NWSW			
ADDRESS	PHONE NUMBER	FAX NUMBER	DATE SHIPPED
CITY STATE ZIP	SAMPLER (PLEASE PRINT): DAVID CALHOUN		MATRIX TYPES: WW-WASTEWATER DW-DRINKING WATER GW-GROUND WATER WWSL-SLUDGE NAS-SOLID OTHER:
CONTACT PERSON: DAVE LONG	SAMPLER'S SIGNATURE: David Calh		

(3) ANALYSIS REQUESTED — VOA

(4) (FOR LAB USE ONLY)
LOGIN # 0105240
LOGGED BY: JAS
LAB PROJ. #
TEMPLATE:
PROJ. MGR.:

(2) SAMPLE DESCRIPTION	DATE COLLECTED	TIME COLLECTED	SAMPLE TYPE GRAB	SAMPLE TYPE COMP	MATRIX TYPE	TOTAL # OF CONT	VOA	REMARKS
MW 18	5/22/01	1010			GW	3	Y	
FIELD BLANK	"	1015			DI	3	Y	

(5) TURNAROUND TIME REQUESTED (PLEASE CIRCLE) NORMAL RUSH
(RUSH TAT IS SUBJECT TO PDC LABS APPROVAL AND SURCHARGE)
RUSH RESULTS VIA (PLEASE CIRCLE) FAX PHONE
FAX # IF DIFFERENT FROM ABOVE: PHONE # IF DIFFERENT FROM ABOVE:

(6) *The sample temperature will be measured upon receipt at the lab. By initialing this area you request that the lab notify you, before proceeding with analysis, if the sample temperature is outside of the range of 0.1-6.0°C. By not initialing this area you allow the lab to proceed with analytical testing regardless of the sample temperature.* _____

(7) RELINQUISHED BY: (SIGNATURE)	DATE	TIME	RECEIVED BY: (SIGNATURE)	DATE	TIME
Dave Calh	5/23/01	15'5			
RELINQUISHED BY: (SIGNATURE)	DATE	TIME	RECEIVED AT LAB BY: (SIGNATURE)	DATE	TIME
			J. Stanton	5/23/01	13:55

(8) COMMENTS: (FOR LAB USE ONLY)

SAMPLE TEMPERATURE UPON RECEIPT	_____ °C
CHILL PROCESS STARTED PRIOR TO RECEIPT	Y OR N
SAMPLES RECEIVED ON ICE	Y OR N
BOTTLES RECEIVED IN GOOD CONDITION	Y OR N
BOTTLES FILLED WITH ADEQUATE VOLUME	Y OR N
SAMPLES RECEIVED WITHIN HOLD TIME(S)	Y OR N

PDC LABORATORIES, INC.
2231 WEST ALTORFER DRIVE
PEORIA, IL 61615

PHONE # 309-692-9688
FAX # 309-692-9689

CHAIN OF CUSTODY RECORD

ALL SHADED AREAS MUST BE COMPLETED BY CLIENT (PLEASE PRINT)

(1) CLIENT	PROJECT NUMBER	P.O. NUMBER	MEANS SHIPPED
NWSW			
ADDRESS	PHONE NUMBER	FAX NUMBER	DATE SHIPPED
CITY / STATE / ZIP	SAMPLER (PLEASE PRINT): DAVID Calhoun		MATRIX TYPES: WW-WASTEWATER, DW-DRINKING WATER, GW-GROUND WATER, WWSL-SLUDGE, NAS-SOLID, OTHER:
CONTACT PERSON: DAVE Long	SAMPLER'S SIGNATURE: David Calhoun		

(3) ANALYSIS REQUESTED: VOA

(4) (FOR LAB USE ONLY)
LOGIN # 0105294U JAT
LOGGED BY:
LAB PROJ. #
TEMPLATE:
PROJ. MGR.:

(2) SAMPLE DESCRIPTION	DATE COLLECTED	TIME COLLECTED	SAMPLE TYPE GRAB	SAMPLE TYPE COMP	MATRIX TYPE	TOTAL # OF CONT	VOA	REMARKS
MW 2	5/22/01	1420			GW	3	X	
MW 3	5/23/01	0859			GW	3	X	
MW 4	5/23/01	0825			GW	3	X	
MW 5	5/22/01	1244			GW	3	X	
MW 6	5/22/01	1138			GW	3	X	
MW 8	5/22/01	1450			GW	3	X	
MW 11	5/22/01	1315			GW	3	X	
MW 12	5/22/01	1530			GW	3	X	
MW 15	5/23/01	0945			GW	3	X	
MW 16	5/22/01	1112			GW	3	X	
MW 17	5/22/01	1036			GW	3	X	
MW 17 Dup	5/22/01	1040			GW	3	X	

(5) TURNAROUND TIME REQUESTED (PLEASE CIRCLE) (RUSH TAT IS SUBJECT TO PDC LABS APPROVAL AND SURCHARGE): NORMAL / RUSH

RUSH RESULTS VIA (PLEASE CIRCLE): FAX / PHONE

FAX # IF DIFFERENT FROM ABOVE:

PHONE # IF DIFFERENT FROM ABOVE:

(6) *The sample temperature will be measured upon receipt at the lab. By initialing this area you request that the lab notify you, before proceeding with analysis, if the sample temperature is outside of the range of 0.1-6.0°C. By not initialing this area you allow the lab to proceed with analytical testing regardless of the sample temperature.* _____

(7)	DATE	TIME		DATE	TIME
RELINQUISHED BY: (SIGNATURE) Dave Call	5/23/01	1355	RECEIVED BY: (SIGNATURE)		
RELINQUISHED BY: (SIGNATURE)	DATE	TIME	RECEIVED AT LAB BY: (SIGNATURE) J. Stanton	DATE 5/23/01	TIME 13:55

(8) COMMENTS: (FOR LAB USE ONLY)

SAMPLE TEMPERATURE UPON RECEIPT	3 °C
CHILL PROCESS STARTED PRIOR TO RECEIPT	Y OR N
SAMPLE(S) RECEIVED ON ICE	Y OR N
BOTTLES RECEIVED IN GOOD CONDITION	Y OR N
BOTTLES FILLED WITH ADEQUATE VOLUME	Y OR N
SAMPLES RECEIVED WITHIN HOLD TIME(S)	Y OR N

NORTHWESTERN STEEL AND WIRE COMPANY
Sterling, Illinois

GROUND WATER FIELD SURVEY FORM

Federal I. D. ILD005263157
Ill Site 1950500007

Sample Point I.D. 118
Purge Date 5-22-1
Purge Time 955
Sample Date 5-22-1
Sample Time 1010

12.17
Casing Vol. (gals) 1.9
Vol. Purged (gals) 6
Sample Method Waterra
Seal No.

Elevation
Water Level 13.88
GW Elevation

~~65.14~~
Total Well Depth 26.05
Stick-Up
Sample Temp. (°C) 12.8

Weather Conditions Sunny BREEZY S SW 10 MPH
Sample Appearance
Sampler Comments Well OK

Unable To Obtain Sample (X)
Sample Composited (X)

Reason
Procedure/Proportions

	1	2	3
pH	7.20	7.16	7.15	7.14
Sp. Cond (umhos)	780	780	770	750
	13.4	13.2	12.9	12.8

7.10
6.10

Lab

Comments

FIELD Blank Collected 1015

I certify that sampling procedures were in accordance with EPA and corporate protocols.

Sampler Name (print) DRC Signature Dave Cash

NORTHWESTERN STEEL AND WIRE COMPANY
Sterling, Illinois

GROUND WATER FIELD SURVEY FORM

Federal I. D. ILD005263157
Ill Site 1950500007

Sample Point I.D. MW17
Purge Date 5/22/01
Purge Time 1025
Sample Date 5/22/01
Sample Time 1036

23.11
Casing Vol. (gals) 3.6
Vol. Purged (gals) 12
Sample Method Waterra
Seal No.

Elevation
Water Level 11.14
GW Elevation

34.18
Total Well Depth 34.25
Stick-Up
Sample Temp. (°C) 13

Weather Conditions Partly Cloudy Windy SSW 10+ MPH
Sample Appearance
Sampler Comments

Unable To Obtain Sample (X)
Sample Composited (X)

Reason
Procedure/Proportions

	I	1	2	3
pH	7.09	7.09	7.11	7.15
Sp. Cond	870	850	880	880
(umhos)	13.8	13.7	13.2	13

Lab

Comments

Did a Field Dup on this well 1040

I certify that sampling procedures were in accordance with EPA and corporate protocols.

Sampler Name (print) DRC Signature Dave Calhoun

NORTHWESTERN STEEL AND WIRE COMPANY
Sterling, Illinois

GROUND WATER FIELD SURVEY FORM

Federal I. D. ILD005263157
Ill Site 1950500007

Sample Point I.D. MW 16
Purge Date 5/22/01
Purge Time 1053
Sample Date 5/22/01
Sample Time 1112

35.55
Casing Vol. (gals) 5.7
Vol. Purged (gals) 18
Sample Method Waterra
Seal No.

Elevation
Water Level 12.55
GW Elevation

Total Well Depth 48.10
Stick-Up 0
Sample Temp. (°C) 13.2

Weather Conditions Partly Cloudy Windy 55W 10+
Sample Appearance Clear no odor
Sampler Comments 15 from Bldg - Blocking wind

Unable To Obtain Sample (X)
Sample Composited (X)

Reason
Procedure/Proportions

	I	1	2	3
pH	7.45	7.17	7.09	7.03
Sp. Cond (umhos)	790	800	790	810
	13.8	13.5	13.2	13.2

Lab

Comments

I certify that sampling procedures were in accordance with EPA and corporate protocols.

Sampler Name (print) DRC Signature Dave Calk

NORTHWESTERN STEEL AND WIRE COMPANY
Sterling, Illinois

GROUND WATER FIELD SURVEY FORM

Federal I. D. ILD005263157
Ill Site 1950500007

Sample Point I.D. MW 6
Purge Date 5/22/01
Purge Time 1123
Sample Date 5/22/01
Sample Time 1138

24.66
Casing Vol. (gals) 3.9
Vol. Purged (gals) 12
Sample Method Waterra
Seal No.

Elevation
Water Level 11.19
GW Elevation

Total Well Depth 35.85
Stick-Up
Sample Temp. (°C) 12.6

Weather Conditions Partly Sunny Windy SSW 10+ MPH
Sample Appearance Clear
Sampler Comments Standing water in Annular Space - RAN into WELL A Possibility - Top of well is almost below packing

Unable To Obtain Sample (X)
Sample Composited (X)
Reason
Procedure/Proportions

	I	1	2	3
pH	7.79	7.37	7.31	7.34
Sp. Cond	230	670	670	720
(umhos)	13	13	12.8	12.6

Lab

Comments

I certify that sampling procedures were in accordance with EPA and corporate protocols.

Sampler Name (print) DRC Signature Dan Call

NORTHWESTERN STEEL AND WIRE COMPANY
Sterling, Illinois

GROUND WATER FIELD SURVEY FORM

Federal I. D. ILD005263157
Ill Site 1950500007

37.13

Sample Point I.D. MW 5
Purge Date 5-22-1
Purge Time 1230
Sample Date 5-22 1
Sample Time 1241

Casing Vol. (gals) 6
Vol. Purged (gals) 18
Sample Method Waterra
Seal No.

Elevation
Water Level 10.90
GW Elevation

Total Well Depth 48.33
Stick-Up
Sample Temp. (°C) 13.3

Weather Conditions
Sample Appearance
Sampler Comments water in annular space ~ 1/2 from top of casing

Unable To Obtain Sample (X)
Sample Composited (X)

Reason
Procedure/Proportions

pH	7.53	7.23	7.24	7.24
Sp. Cond	240	560	870	830
(umhos)	13.9	13.6	13.5	13.3

Lab

Comments

I certify that sampling procedures were in accordance with EPA and corporate protocols.

Sampler Name (print) DK Signature Dave Cobb

NORTHWESTERN STEEL AND WIRE COMPANY
Sterling, Illinois

GROUND WATER FIELD SURVEY FORM

Federal I. D. ILD005263157
Ill Site 1950500007

Sample Point I.D. MW 11
Purge Date 5/22/01
Purge Time 1302
Sample Date 5/22/01
Sample Time 1315

11.02 Casing Vol. (gals) 1.8
Vol. Purged (gals) 5.5
Sample Method Bailer
Seal No.

Elevation
Water Level 5.40
GW Elevation

16.29 Total Well Depth 16.42
Stick-Up
Sample Temp. (°C) 11.3

Weather Conditions Cloudy - Spitting Rain SSW 10+ MPH
Sample Appearance Turbid Black
Sampler Comments
Well OK Next Ditch Water in Ditch

Unable To Obtain Sample (X)
Sample Composited (X)
Reason
Procedure/Proportions

	I	1	2	3
pH	7.32	7.20	7.25	7.21
Sp. Cond (umhos)	760	820	800	820
	11.9	11.6	11.5	11.3

Lab

Comments

I certify that sampling procedures were in accordance with EPA and corporate protocols.

Sampler Name (print) DRC Signature Dave Cobb

NORTHWESTERN STEEL AND WIRE COMPANY
Sterling, Illinois

GROUND WATER FIELD SURVEY FORM

Federal I. D. ILD005263157
Ill Site 1950500007

Sample Point I.D. MW 2
Purge Date 5-22-01
Purge Time 1410
Sample Date 5-22-01
Sample Time 1420

11.6
Casing Vol. (gals) 1.9
Vol. Purged (gals) 6
Sample Method Bailer
Seal No.

Elevation
Water Level 4.70
GW Elevation

K.23
Total Well Depth 1630
Stick-Up
Sample Temp. (°C) 11.6

Weather Conditions Cloudy - Rain intermitant
Sample Appearance Turbid - NO ODOR Black
Sampler Comments Grass + WEEDS
Put I BEAM Across Rest of way to get to well
Tall GRASS + WEEDS water in Ditch

Unable To Obtain Sample (X)
Sample Composited (X)
Reason
Procedure/Proportions

	I	1	2	3
pH	7.53	7.46	7.57	7.52
Sp. Cond	800	830	820	820
(umhos)	12.7	11.7	11.6	11.6

Lab

Comments

I certify that sampling procedures were in accordance with EPA and corporate protocols.

Sampler Name (print) DRC Signature Dave Calhoun

NORTHWESTERN STEEL AND WIRE COMPANY
Sterling, Illinois

GROUND WATER FIELD SURVEY FORM

Federal I. D. ILD005263157
Ill Site 1950500007

Sample Point I.D. MW8 — 58.87
Purge Date 5/22 — Casing Vol. (gals) 9.4
Purge Time 1430 — Vol. Purged (gals) 28
Sample Date 5/22/01 — Sample Method Waterra
Sample Time — Seal No.

Elevation — Total Well Depth 65.18
Water Level 6.31 — Stick-Up
GW Elevation — Sample Temp. (°C) 11.3

Weather Conditions Cloudy Wind SSW 15-20+ MPH
Sample Appearance Slightly turbid @ first no odor clear @ Sampling
Sampler Comments TALL GRASS + WEED

Unable To Obtain Sample (X)____ Reason
Sample Composited (X)____ Procedure/Proportions

	T	1	2	3
pH	7.57	7.40	7.34	7.31
Sp. Cond	700	720	740	740
(umhos)	12.3	11.9	11.5	11.3

Lab

Comments

I certify that sampling procedures were in accordance with EPA and corporate protocols.

Sampler Name (print) DRC Signature Dave Carlson

NORTHWESTERN STEEL AND WIRE COMPANY
Sterling, Illinois

GROUND WATER FIELD SURVEY FORM

Federal I. D. ILD005263157
Ill Site 1950500007

Sample Point I.D. MW 12
Purge Date 5/22/01
Purge Time 1505
Sample Date 5/22
Sample Time 1530

7.46
Casing Vol. (gals) 1.2
Vol. Purged (gals) 3.6
Sample Method Bailer
Seal No.

Elevation
Water Level 9.40
GW Elevation

16.56
Total Well Depth 16.86
Stick-Up
Sample Temp. (°C)

Weather Conditions Cloudy Off+on Rain S SW 10-15 MPH
Sample Appearance Slightly turbid NO ODOR
Sampler Comments Tall GRASS + WEEDS

Unable To Obtain Sample (X)
Sample Composited (X)
Reason
Procedure/Proportions

	I	1	2	3
pH	7.26	7.26	7.25	7.28
Sp. Cond (umhos)	770 11	770 10.8	790 10.2	780 10

Lab

Comments

I certify that sampling procedures were in accordance with EPA and corporate protocols.

Sampler Name (print) DRC Signature Dave Calhoun

NORTHWESTERN STEEL AND WIRE COMPANY
Sterling, Illinois

GROUND WATER FIELD SURVEY FORM

Federal I. D. ILD005263157
Ill Site 1950500007

Sample Point I.D. MW 4
Purge Date 5/23/01
Purge Time 0800
Sample Date 52301
Sample Time 0825

29.96
Casing Vol. (gals) 4.8
Vol. Purged (gals) 14.5
Sample Method Waterra
Seal No.

Elevation
Water Level 11.73
GW Elevation

Total Well Depth 41.69
Stick-Up
Sample Temp. (°C) 11.2

Weather Conditions Cloudy Cool
Sample Appearance Clear no odor
Sampler Comments Well OK

Unable To Obtain Sample (X)
Sample Composited (X)

Reason
Procedure/Proportions

	I	1	2	3
pH	7.20	7.04	7.16	7.21
Sp. Cond (umhos)	260	820	880	840
	11.4	11.2	11.2	11.2

Lab

Comments

I certify that sampling procedures were in accordance with EPA and corporate protocols.

Sampler Name (print) DRC Signature Dave Calhoun

NORTHWESTERN STEEL AND WIRE COMPANY
Sterling, Illinois

GROUND WATER FIELD SURVEY FORM

Federal I. D. ILD005263157
Ill Site 1950500007

Sample Point I.D. MW 3
Purge Date 5/23/01
Purge Time 0830
Sample Date 5/23/01
Sample Time 0859

29.23 Casing Vol. (gals) 4.7
Vol. Purged (gals) 14
Sample Method Waterra
Seal No.

Elevation
Water Level 12.99
GW Elevation

42.12 Total Well Depth 42.22
Stick-Up 0
Sample Temp. (°C) 11.5

Weather Conditions Cloudy Cool
Sample Appearance Clear no odor
Sampler Comments Well ok

Unable To Obtain Sample (X)
Sample Composited (X)

Reason
Procedure/Proportions

pH	7.16	7.18	7.13	7.17
Sp. Cond (umhos)	840	850	840	840
	11.7	11.5	11.5	11.5

Lab

Comments

I certify that sampling procedures were in accordance with EPA and corporate protocols.

Sampler Name (print) DRC Signature Dave Calhoun

NORTHWESTERN STEEL AND WIRE COMPANY
Sterling, Illinois

GROUND WATER FIELD SURVEY FORM

Federal I. D. ILD005263157
Ill Site 1950500007

Sample Point I.D. MW 15
Purge Date 5/23/01
Purge Time 0930
Sample Date 5/23/01
Sample Time 0945

11.16 Casing Vol. (gals) 1.8
Vol. Purged (gals) 5.5
Sample Method ~~Waterra~~ DRC Bailer
Seal No.

Elevation
Water Level 12.87
GW Elevation

23.80 Total Well Depth 24.03
Stick-Up Ø
Sample Temp. (°C) 11.3

Weather Conditions Cloudy Cool
Sample Appearance ORange colour (STAINED)
Sampler Comments Well OK
Soft Bottom - about 1" of BROWN MUD on end of DTW Probe

Unable To Obtain Sample (X)
Sample Composited (X)
Reason
Procedure/Proportions

	I	1	2	3
pH	7.01	7.01	6.99	7.03
Sp. Cond (umhos)	820	870	880	890
	11.9	11.7	11.4	11.3

Lab

Comments

I certify that sampling procedures were in accordance with EPA and corporate protocols.

Sampler Name (print) DRC Signature Dave Calhoun

PDC LABORATORIES, INC.
2231 WEST ALTORFER DRIVE
PEORIA, IL 61615

PHONE # 309-692-9688
FAX # 309-692-9689

CHAIN OF CUSTODY RECORD

ALL SHADED AREAS MUST BE COMPLETED BY CLIENT (PLEASE PRINT)

1 CLIENT	PROJECT NUMBER	P.O. NUMBER	MEANS SHIPPED
NWSW			
ADDRESS	PHONE NUMBER	FAX NUMBER	DATE SHIPPED
CITY STATE ZIP	SAMPLER (PLEASE PRINT): DAVID Calhoun		MATRIX TYPES: WW-WASTEWATER DW-DRINKING WATER GW-GROUND WATER WWSL-SLUDGE NAS-SOLID OTHER:
CONTACT PERSON: DAVE Long	SAMPLER'S SIGNATURE: Dave Calhoun		

3 ANALYSIS REQUESTED: VOA

4 (FOR LAB USE ONLY)
LOGIN # _____
LOGGED BY: _____
LAB PROJ. # _____
TEMPLATE: _____
PROJ. MGR.: _____

2 SAMPLE DESCRIPTION	DATE COLLECTED	TIME COLLECTED	SAMPLE TYPE GRAB	SAMPLE TYPE COMP	MATRIX TYPE	TOTAL # OF CONT	VOA	REMARKS
MW 2	5/22/01	1420			GW	3	X	
MW 3	5/23/01	0859			GW	3	X	
MW 4	5/23/01	0825			GW	3	X	
MW 5	5/22/01	1244			GW	3	X	
MW 6	5/22/01	1138			GW	3	X	
MW 8	5/22/01	1450			GW	3	X	
MW 11	5/22/01	1315			GW	3	X	
MW 12	5/22/01	1530			GW	3	X	
MW 15	5/23/01	0945			GW	3	X	
MW 16	5/22/01	1112			GW	3	X	
MW 17	5/22/01	1036			GW	3	X	
MW 17 Dup	5/22/01	1040			GW	3	X	

5 TURNAROUND TIME REQUESTED (PLEASE CIRCLE) NORMAL RUSH
(RUSH TAT IS SUBJECT TO PDC LABS APPROVAL AND SURCHARGE)
RUSH RESULTS VIA (PLEASE CIRCLE) FAX PHONE
FAX # IF DIFFERENT FROM ABOVE: PHONE # IF DIFFERENT FROM ABOVE:

6 *The sample temperature will be measured upon receipt at the lab. By initialing this area you request that the lab notify you, before proceeding with analysis, if the sample temperature is outside of the range of 0.1-6.0°C. By not initialing this area you allow the lab to proceed with analytical testing regardless of the sample temperature.* _____

7	DATE		DATE
RELINQUISHED BY: (SIGNATURE) Dave Calhoun	5/23/01	RECEIVED BY: (SIGNATURE)	
	TIME		TIME
RELINQUISHED BY: (SIGNATURE)	DATE	RECEIVED AT LAB BY: (SIGNATURE)	DATE
	TIME		TIME

8 COMMENTS: (FOR LAB USE ONLY)

SAMPLE TEMPERATURE UPON RECEIPT	_____ °C
CHILL PROCESS STARTED PRIOR TO RECEIPT	Y OR N
SAMPLE(S) RECEIVED ON ICE	Y OR N
BOTTLES RECEIVED IN GOOD CONDITION	Y OR N
BOTTLES FILLED WITH ADEQUATE VOLUME	Y OR N
SAMPLES RECEIVED WITHIN HOLD TIME(S)	Y OR N

PDC LABORATORIES, INC.
2231 WEST ALTORFER DRIVE
PEORIA, IL 61615

PHONE # 309-692-9688
FAX # 309-692-9689

CHAIN OF CUSTODY RECORD

ALL SHADED AREAS MUST BE COMPLETED BY CLIENT (PLEASE PRINT)

(1) CLIENT	PROJECT NUMBER	P.O. NUMBER	MEANS SHIPPED
NWSW			
ADDRESS	PHONE NUMBER	FAX NUMBER	DATE SHIPPED
CITY STATE ZIP	SAMPLER (PLEASE PRINT): DAVID CALHOUN		MATRIX TYPES: WW-WASTEWATER DW-DRINKING WATER GW-GROUND WATER WWSL-SLUDGE NAS-SOLID OTHER:
CONTACT PERSON: DAVE LONG	SAMPLER'S SIGNATURE: David Call		

(3) ANALYSIS REQUESTED: VOA

(4) (FOR LAB USE ONLY)
LOGIN # _____
LOGGED BY: _____
LAB PROJ. # _____
TEMPLATE: _____
PROJ. MGR.: _____

(2) SAMPLE DESCRIPTION	DATE COLLECTED	TIME COLLECTED	SAMPLE TYPE GRAB	SAMPLE TYPE COMP	MATRIX TYPE	TOTAL # OF CONT	VOA	REMARKS
MW 18	5/22/01	1010			GW	3	Y	
Field Blank	"	1015			DI	3	X	

(5) TURNAROUND TIME REQUESTED (PLEASE CIRCLE) NORMAL RUSH
(RUSH TAT IS SUBJECT TO PDC LABS APPROVAL AND SURCHARGE)
RUSH RESULTS VIA (PLEASE CIRCLE) FAX PHONE
FAX # IF DIFFERENT FROM ABOVE: PHONE # IF DIFFERENT FROM ABOVE:

(6) *The sample temperature will be measured upon receipt at the lab. By initialing this area you request that the lab notify you, before proceeding with analysis, if the sample temperature is outside of the range of 0.1-6.0°C. By not initialing this area you allow the lab to proceed with analytical testing regardless of the sample temperature.* _____

(7) RELINQUISHED BY: (SIGNATURE)	DATE	TIME	RECEIVED BY: (SIGNATURE)	DATE	TIME
Dave Call	5/23/01				
RELINQUISHED BY: (SIGNATURE)	DATE	TIME	RECEIVED AT LAB BY: (SIGNATURE)	DATE	TIME

(8) COMMENTS: (FOR LAB USE ONLY)

SAMPLE TEMPERATURE UPON RECEIPT _____ °C
CHILL PROCESS STARTED PRIOR TO RECEIPT Y OR N
SAMPLE(S) RECEIVED ON ICE Y OR N
BOTTLES RECEIVED IN GOOD CONDITION Y OR N
BOTTLES FILLED WITH ADEQUATE VOLUME Y OR N
SAMPLES RECEIVED WITHIN HOLD TIME(S) Y OR N

PDC Laboratories, Inc.
P.O. Box 9071 • Peoria, IL 61612-9071
(309) 692-9688 • (800) 752-6651 • FAX (309) 692-9689

Report Cover Page

Northwestern Steel & Wire Co.
121 Wallace Street

Sterling, IL 61081

Attn: Mr. Dave Long

Date Received: 27-Jul-01
Date Reported: 31-Aug-01
PO #: H2 00 -63878
PDC Cust. # : 275706

Login No. 01073495

This report includes information regarding the following described samples as received by the laboratory and is only valid for the parameters tested. This report contains 1 results page(s) not including the cover page(s).

Sample No.	Client ID	Site	Locator
01073495-1	RESAMPLE	PRE-RCRA LF	MW 16

Certified by: _____
Kurt C. Stepping, Director of Client Services

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State of Illinois Bacteriological Analysis in Drinking Water Certified Lab Registry No. 17533
State of Arkansas Certified Wastewater and Hazardous Waste Lab
State of Indiana Certified Drinking Water Lab No. C-IL-04
State of Iowa Certified Wastewater Lab No. 240
American Industrial Hygiene Association Bulk/Air Asbestos Proficiency Program Lab ID No. 101206
State of North Dakota Wastewater and Hazardous Waste CertifiedLab No. R-094
State of Wisconsin Certified Wastewater and Hazardous Waste Lab ID No. 998294430

PDC Laboratories, Inc.
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Laboratory Results

Northwestern Steel & Wire Co.
121 Wallace Street

Sterling, IL 61081

Attn: Mr. Dave Long

Date Received: 27-Jul-01
Date Reported: 31-Aug-01
PO #: H2 00 -63878
PDC Cust. # : 275706

Login No. 01073495

Sample No: 01073495-1
Client ID: RESAMPLE
Site: PRE-RCRA LF
Locator: MW 16
Collect Date: 27-JUL-01 15:20

Parameter		Result	Units	Date	By
SW-846 Method 8260B					
cis-1,2-Dichloroethene		29.	ug/l	06-Aug-01 12:00	PSB
Vinyl chloride	<	2.0	ug/l	06-Aug-01 12:00	PSB

PDC LABORATORIES, INC.
2231 WEST ALTORFER DRIVE
PEORIA, IL 61615

PHONE # 309-692-9688
FAX # 309-692-9689

CHAIN OF CUSTODY RECORD

ALL SHADED AREAS MUST BE COMPLETED BY CLIENT (PLEASE PRINT)

1 CLIENT	PROJECT NUMBER	P.O. NUMBER	MEANS SHIPPED	3 ANALYSIS REQUESTED	4 (FOR LAB USE ONLY)
NWSW Pre RCRA					LOGIN # 0107349S-1
ADDRESS	PHONE NUMBER	FAX NUMBER	DATE SHIPPED		LOGGED BY: PJT
CITY STATE ZIP	SAMPLER (PLEASE PRINT): Dan Brown		MATRIX TYPES: WW-WASTEWATER DW-DRINKING WATER GW-GROUND WATER WWSL-SLUDGE NAS-SOLID OTHER:		LAB PROJ. # TEMPLATE: PROJ. MGR.:
CONTACT PERSON	SAMPLER'S SIGNATURE: Dan Brown				

2 SAMPLE DESCRIPTION	DATE COLLECTED	TIME COLLECTED	SAMPLE TYPE GRAB	SAMPLE TYPE COMP	MATRIX TYPE	TOTAL # OF CONT	REMARKS
MW 16	7/27/	1520			GW	3	

5 TURNAROUND TIME REQUESTED (PLEASE CIRCLE) NORMAL RUSH
(RUSH TAT IS SUBJECT TO PDC LABS APPROVAL AND SURCHARGE)

RUSH RESULTS VIA (PLEASE CIRCLE) FAX PHONE

FAX # IF DIFFERENT FROM ABOVE: PHONE # IF DIFFERENT FROM ABOVE:

6 *The sample temperature will be measured upon receipt at the lab. By initialing this area you request that the lab notify you, before proceeding with analysis, if the sample temperature is outside of the range of 0.1-6.0°C. By not initialing this area you allow the lab to proceed with analytical testing regardless of the sample temperature.* _____

7	DATE		DATE
RELINQUISHED BY: (SIGNATURE) Dan Brown	7/27	RECEIVED BY: (SIGNATURE)	
	TIME 1703		TIME
RELINQUISHED BY: (SIGNATURE)	DATE	RECEIVED AT LAB BY: (SIGNATURE) Pam Jewell	DATE 7/27
	TIME		TIME 1705

8 COMMENTS: (FOR LAB USE ONLY)

SAMPLE TEMPERATURE UPON RECEIPT 2 °C
CHILL PROCESS STARTED PRIOR TO RECEIPT (Y) OR N
SAMPLE(S) RECEIVED ON ICE (Y) OR N
BOTTLES RECEIVED IN GOOD CONDITION (Y) OR N
BOTTLES FILLED WITH ADEQUATE VOLUME (Y) OR N
SAMPLES RECEIVED WITHIN HOLD TIME(S) (Y) OR N

PAGE _____ OF _____

NORTHWESTERN STEEL AND WIRE COMPANY
Sterling, Illinois

GROUND WATER FIELD SURVEY FORM

Federal I. D. ILD005263157
Ill Site 1950500007

Sample Point I.D. MW 1C
Purge Date 7-27-1
Purge Time 1450
Sample Date 7-27-1
Sample Time 1520

Casing Vol. (gals) 3.54 x .16 5.3C
Vol. Purged (gals) 16.5'
Sample Method Waterra
Seal No.

Elevation
Water Level 14.5C
GW Elevation

Total Well Depth 48.10
Stick-Up 8
Sample Temp. (°C) 14.5

Weather Conditions Sunny 80°F NW N.W 5 mph
Sample Appearance no odor / slight turbid
Sampler Comments

Unable To Obtain Sample (X)
Sample Composited (X)

Reason
Procedure/Proportions

	I	1	2	3
pH	7.15	7.21	7.11	7.04
Sp. Cond (umhos)	660	680	710	720

Lab

Comments

I certify that sampling procedures were in accordance with EPA and corporate protocols.

Sampler Name (print) JM Burr Signature

PDC LABORATORIES, INC.
2231 WEST ALTORFER DRIVE
PEORIA, IL 61615
PHONE # 309-692-9688
FAX # 309-692-9689

CHAIN OF CUSTODY RECORD

ALL SHADED AREAS MUST BE COMPLETED BY CLIENT (PLEASE PRINT)

(1) CLIENT	PROJECT NUMBER	P.O. NUMBER	MEANS SHIPPED	(3) ANALYSIS REQUESTED	(4) (FOR LAB USE ONLY)
NWSW Pre RCRA					LOGIN #
ADDRESS	PHONE NUMBER	FAX NUMBER	DATE SHIPPED		LOGGED BY:
CITY STATE ZIP	SAMPLER (PLEASE PRINT) DM Brauer		MATRIX TYPES: WW-WASTEWATER DW-DRINKING WATER GW-GROUND WATER WWSL-SLUDGE NAS-SOLID OTHER:		LAB PROJ. #
CONTACT PERSON	SAMPLER'S SIGNATURE DM Brauer				TEMPLATE:
					PROJ. MGR.:

(2) SAMPLE DESCRIPTION	DATE COLLECTED	TIME COLLECTED	SAMPLE TYPE GRAB	SAMPLE TYPE COMP	MATRIX TYPE	TOTAL # OF CONT	REMARKS
MW 16	7/27/1	1520			GW	3	

(5) TURNAROUND TIME REQUESTED (PLEASE CIRCLE) NORMAL RUSH
(RUSH TAT IS SUBJECT TO PDC LABS APPROVAL AND SURCHARGE)
RUSH RESULTS VIA (PLEASE CIRCLE) FAX PHONE
FAX # IF DIFFERENT FROM ABOVE: PHONE # IF DIFFERENT FROM ABOVE:

(6) *The sample temperature will be measured upon receipt at the lab. By initialing this area you request that the lab notify you, before proceeding with analysis, if the sample temperature is outside of the range of 0.1-6.0°C. By not initialing this area you allow the lab to proceed with analytical testing regardless of the sample temperature.* _____

(7) RELINQUISHED BY: (SIGNATURE)	DATE	RECEIVED BY: (SIGNATURE)	DATE
	TIME		TIME
RELINQUISHED BY: (SIGNATURE)	DATE	RECEIVED AT LAB BY: (SIGNATURE)	DATE
	TIME		TIME

(8) COMMENTS: (FOR LAB USE ONLY)

SAMPLE TEMPERATURE UPON RECEIPT _____ °C
CHILL PROCESS STARTED PRIOR TO RECEIPT Y OR N
SAMPLE(S) RECEIVED ON ICE Y OR N
BOTTLES RECEIVED IN GOOD CONDITION Y OR N
BOTTLES FILLED WITH ADEQUATE VOLUME Y OR N
SAMPLES RECEIVED WITHIN HOLD TIME(S) Y OR N

File
Corrective Action

NORTHWESTERN
STEEL AND WIRE COMPANY

December 28, 2001

Illinois Environmental Protection Agency
Bureau of Land
Planning and Reporting Section # 24
1021 North Grand Avenue East
P. O. Box 19276
Springfield, IL 62794-9276

RE: Northwestern Steel and Wire Co.
ILD 005 263 157
RCRA Part B Permit # B – 33R

Dear Sirs:

Northwestern Steel and Wire Company (NWSW) hereby submits the semi-annual progress report to IEPA for the Corrective Measures Implementation (CMI) for NWSW's pre-RCRA landfill under the renewed RCRA permit # B-33R. This progress report covers the period from September 22, 2000 through March 22, 2001. The preparation of the CMI was required by the Part B permit modification issued by the United States Environmental Protection Agency on March 22, 1993.

Please contact me at extension 2451 if you have any questions regarding this submission.

Very truly yours,

David E. Long
Environmental Manager

Enclosures

cc. Mr. Gale Hruska, USEPA Region V

CERTIFIED MAIL -- RETURN RECEIPT REQUESTED
7001 0360 0002 3201 8771

121 Wallace Street • PO Box 618 • Sterling, Illinois 61081-0618 • USA
Phone (815) 625-2500

Northwestern Steel and Wire Company
Corrective Measures Implementation
Semi-Annual Progress Report
September 22, 2000 through March 22, 2001

August 1, 2001

CONTENTS

1.0 INTRODUCTION

This semi-annual progress report (the Report) is the fourth progress report for the renewed RCRA Part B permit for Northwestern Steel and Wire Company (NWSW), Sterling, Illinois. This report documents the Corrective Measures Implementation (CMI) being conducted on the pre-RCRA landfill located at the NWSW facility. The Report covers the period September 22, 2000 through March 22, 2001. The CMI is being conducted in accordance with the approved CMI operation of the corrective measures selected to protect human health and the environment. The CMI work plan contains the procedures necessary to monitor the performance of the corrective measures implemented at the pre-RCRA landfill.

1.1 History of the Pre-RCRA Landfill

The landfill is located approximately 500 feet north of the Rock River (Figure 1) and covers approximately 13.5 acres and is approximately eight to ten feet deep. Solid waste was disposed in the pre-RCRA landfill beginning in 1974. The waste disposed in the pre-RCRA landfill consisted of slag, brick, construction debris, and two sludges generated by on-site pollution control systems. The pre-RCRA landfill was closed in 1980 and a new RCRA landfill opened to receive the two sludges only. This new landfill received a Part B permit for the disposal of these two sludges on November 4, 1987. The permit was subsequently renewed for ten years. The new permit was issued on March 10, 1999, with an effective date of April 14, 1999.

One condition of the RCRA landfill permit required a RCRA Facility Investigation (RFI) of the pre-RCRA landfill to determine if any releases from the landfill had occurred. The RFI was conducted in phases and determined that trichloroethylene (TCE), cis 1,2-dichloroethylene (DCE), and vinyl chloride (VC) were present in the groundwater beneath and downgradient from the landfill at elevated concentrations. Based on the findings of the RFI, the United States Environmental Protection Agency (U.S. EPA) required that NWSW conduct a Corrective Measures Study (CMS) to determine the best

corrective measure alternative to achieve an acceptable level of risk within the exposed population. The CMS consisted of three distinct tasks: 1) additional field tests, 2) a risk assessment, and 3) an evaluation of potential corrective measures and recommendation of the alternative(s) that would result in an acceptable risk to human health.

1.2 Description of the Selected CMI Remedy

The various remediation technologies were evaluated as to their potential applicability to the pre-RCRA Landfill situation. This evaluation included no action, limited action, source control, groundwater remediation, and a combination of source control and groundwater remediation. The risk assessment showed that the present situation results in an acceptable level of risk to human health and the environment. Therefore the no action and limited action alternatives are acceptable means of complying with the goals of the CMS. Both result in the protection of human health. The limited action alternative, which is incorporated in the Part B permit modification effective March 22, 1993, offers the additional benefit of on-going monitoring which will provide for the detection of changes in concentrations of the compounds of concern (TCE, DCE and VC). The renewed permit removed the testing requirement for TCE, since TCE has not been detected in any of the monitoring wells in over eight years.

2.0 CMI OPERATIONS

The corrective measure design for the pre-RCRA landfill consists of 1) a system to prevent unauthorized disturbance of the soil and fill in the pre-RCRA landfill, and 2) a system of continued groundwater monitoring until the landfill meets the cleanup objectives contained in the Part B permit. These corrective measures, which have not been changed since the last semi-annual progress report, are described below.

2.1 Prevention of Unauthorized Disturbance

Unauthorized disturbance of the soil and fill in the pre-RCRA landfill are prevented by NWSW's existing facility security system. NWSW has a facility security system in place

to prevent access by unauthorized personnel to the pre-RCRA landfill. NWSW employs 8 full-time guards plus 4 guard sergeants and a security supervisor. One sergeant supervises each eight-hour shift. The sergeant is responsible for conducting two complete inspections of the entire plant perimeter each shift to assure unauthorized personnel are not present. The pre-RCRA landfill area is included in these inspections.

A security fence with No Trespassing signs posted at various places along the fence surrounds the facility site occupied by NWSW. Access to the facility is gained through secured gates, therefore preventing unauthorized personnel from entering the facility. The main access gate to the facility is equipped with a guardhouse that is occupied at all times. A gate located on the western edge of the facility, adjacent to the non-hazardous waste landfill, remains closed and locked with access available only to authorized personnel. Additional signs have been posted around the pre-RCRA landfill as needed.

In March of 2001, NWSW landfill personnel discovered that the southeast corner of the landfill cover had been disturbed. Investigation so far indicated that the Union Pacific Railroad may have buried an electrical cable 2-3 feet deep from a box north of the landfill to a control shed located next to the tracks at the south end of the landfill. NWSW's attempts to contact the railroad have not been successful, but are continuing.

2.2 Groundwater Sampling Procedures

The groundwater monitoring wells around the pre-RCRA landfill are shown in Figure 2. The renewed Part B permit has identified the monitoring wells with new letter/number designations as follows:

Previous ID number	New ID number
MW-1	G101
MW-2	G102
MW-3	G103
MW-4	G104
MW-5	G105

MW-6R(replacement well)	R106
MW-7	G107
MW-8	G108
MW-9	G109
MW-10	G110
MW-11	G111
MW-12	G112
MW-13	G113
MW-14	G114
MW-15	G115
MW-16	G116
MW-17	G117
MW-18	G118

The renewed RCRA permit requires that monitoring wells G103, G104, R105, G111, G116 and G117 be sampled semi-annually in April-May and October-November, and that monitoring wells G102, G106, G108, G112, G115 and G118 be sampled annually in April-May. Monitoring wells G103-4, R105, G111 and G116-7 delineate a Groundwater Management Zone (GMZ) at the site.

On November 14, 2000, six monitoring wells were sampled, as is the semi-annual requirement. The results of this sampling are being submitted with this progress report. The first year of required quarterly sampling was completed with the May 10, 1994 sampling event. NWSW has now moved into the semi-annual monitoring program.

According to Mrs. E. Kay Ingles of the Daily Analytical Laboratory (now PDC Laboratories, Inc.) the monitoring well sampling procedure is as follows.

Static water levels and well depth were measured in each well prior to sampling. Water levels were measured three consecutive times to the nearest 0.01-foot using a steel tape or electrical water level sensor, and recorded in the field notebook. Prior to collecting

groundwater samples for chemical analysis, water standing in the well casing and filter pack was purged so that the sample would be obtained from water representative of groundwater in the aquifer. A minimum of three well casing volumes of water was removed using a bailer or an inertial pump; whichever was appropriate for the depth of the well. Purged water was monitored for pH and specific conductance. Purging was considered complete when a minimum of three well casing volumes had been purged and the pH and specific conductance parameters had stabilized. Purged groundwater was temporarily stored in dedicated plastic containers and pumped back into each monitoring well after completion of each sampling event.

Groundwater samples from each well were collected using a clean Teflon® bailer. Groundwater samples were carefully poured from the sampling bailer into pre-cleaned, laboratory-supplied glass VOA vials with Teflon® septum caps. The VOA vials were completely filled to eliminate air bubbles. Each groundwater sample was sealed and labeled using labels provided by the analytical laboratory. The sample identification for each sample was as follows:

- Site Identification (NWSW for Northwestern Steel and Wire Co.)
- Monitoring Well Number (G1XX)
- Ground water sample number (GW1) increasing sequentially.

A possible groundwater sample identification number is NWSW-G110-GW2, which indicates that this sample is the second collected at the Northwestern Steel and Wire site from monitoring well G110. Samples were placed on ice in a cooler for sample preservation. Water temperature, pH, Eh, and specific conductance measurements were measured and recorded in the field notebook at the time of sampling. Field measurement equipment were calibrated daily according to the manufacturer's recommendations.

As part of the quality assurance program, one duplicate groundwater sample and one field equipment blank per sampling event was collected and submitted to the laboratory for contaminant analysis. In addition, a trip blank was submitted with each sample shipment and analyzed for VOCs. Samples were collected as described above and were

shipped to the analytical laboratory in a timely manner. Chain-of-custody forms for the samples were included in each shipment.

Groundwater monitoring and sampling equipment was decontaminated prior to use at each monitoring well using procedures discussed in Section 9.12 of the CMI to prevent the possibility of cross-contamination between monitoring wells. Care was taken to prevent the decontaminated well purging and sampling equipment from coming into contact with the ground surface.

When samples were received at the laboratory, sample containers were inspected for integrity, proper labeling, proper preservation, and properly completed chain of custody form(s). The samples were logged in by the laboratory and a unique laboratory sample number assigned to each sample. Laboratory sample numbers were entered into the laboratory's master logbook and used on sample laboratory sheets. Other pertinent information such as the date and time of sample receipt was also recorded. Samples were stored in secured refrigerators at the laboratory.

Groundwater samples were analyzed for VC and DCE. Detailed information on the analytical procedures such as potential interferences, precision and accuracy of the methodology, and method detection limits are identified in Test Methods for Evaluating Solid Waste, SW-846 (EPA, 1986). For each groundwater sampling episode, laboratory quality assurance/quality control (QA/QC) consisted of analyzing field blanks, field duplicates, and standard laboratory QA/QC samples. Analytical analyses from PDC Laboratories are provided as Appendix A.

2.3 Groundwater Sampling Results

During the November 14th sampling event, monitoring wells G103-5, G111, G116 and G117 were sampled and analyzed for VC and DCE. Tables 1 and 2 summarize the

results of the groundwater sampling historical analysis conducted for the CMI Program under the latest RCRA permit.

The results presented in Table 1 show that for the 6 wells sampled, 4 wells (G103, G104, G116 and G 117) show an increase in VC concentration, and well R105 shows a decrease in VC concentration from the levels recorded on May 16-17, 2000, which was the last time these wells were sampled. The VC concentration at well G116 exceeded the maximum allowable permit level: Well G116 had a concentration of 17 ug/L versus a permit limit of 14 ug/L. These exceedances were identified in January 2001. PDC Laboratories was notified and the well was resampled on February 6, 2001. The analysis of the resample was 14 ug/L, which was at the permit limit. For this sampling event, the VC concentration in MW-4 was within the calibration range of the laboratory instrumentation. Consequently, no sample dilution prior to analysis was necessary.

Table 2 provides the analytical results for DCE during the sampling periods from May 1999 to the present. The November 14, 2000 results for the 6 monitoring wells sampled shows an increase in DCE concentration in 4 wells (G104, G111, G116 and G117), and a decrease in DCE concentration in two wells (G103 and G105). The DCE concentration for well G117 did not exceed the maximum allowable permit level of 97 ug/L for any of the three sampling events.

3.0 PROBLEMS ENCOUNTERED

One problem encountered during the six months that are the subject of this report for the implementation of the CMI plan was the VC concentration in well G116. The February retesting, however, showed that the VC concentration had dropped to within permit limits. Since the VC concentrations are now below permit limits, no further steps should be required. A second problem encountered is that a small corner of the landfill cover had been disturbed by trenching for an underground cable. The trench was made and

backfilled before NWSW personnel were aware of the disturbance. NWSW personnel continue to look for reasons for the disturbance.

4.0 PERSONNEL CHANGES

On December 19, 2000, NWSW entered Chapter 11 bankruptcy protection. During the period following this announcement, the project management organization remained the same as initially described in the CMI Work Plan including changes described in prior progress reports.

5.0 ACTIVITIES FOR THE NEXT REPORTING PERIOD

5.1 Description of Activities

The planned activities for the next reporting period include the continued operation and maintenance of the corrective measures implementation program as described in the CMI work plan. This will include periodic landfill inspections and maintenance. The groundwater sampling program and monitoring of the performance of the corrective measures implementation will also continue in accordance with the CMI work plan.

5.2 Schedule

A schedule for future groundwater sampling and reporting requirements is provided in Figure 3.

6.0 TRIGGERING OF CONTINGENT CORRECTIVE MEASURES

Section III(G)(1)(c) of the permit establishes maximum allowable DCE and VC concentrations in monitoring wells G103-5, G111 and G116-7. If an individual maximum concentration is exceeded, then the contingent corrective measures must be implemented. As discussed in Section 2.3, Results of Groundwater Data, the individual triggering concentration for VC was exceeded. However, since subsequent sampling

shows a return to lower VC values, no additional steps will be taken. There has been evidence of unauthorized disturbance of the pre-RCRA landfill soils or fill, and NWSW will continue to investigate how and why this occurred. No contingent corrective measures have been triggered at this time.

7.0 COMMUNITY RELATIONS ACTIVITIES

The Community Relations Plan (CRP) was prepared to guide community relation activities during the implementation of corrective measures at NWSW's pre-RCRA landfill. The purposes of the CRP are to make available to the local community, information concerning the corrective measures actions, and to facilitate communication between NWSW and the community. During this period of the CMI no citizens or interested parties have contacted NWSW concerning the CMI operations at the pre-RCRA landfill.

7.1 Status of the Community Relations Objectives

This section presents the status of the community relations objectives used during the implementation of the corrective measures to ensure that the community is included in the process. The following techniques were organized according to the objectives of the community relations program:

1. Objective: Provide community with information.

   Technique: Establish information repository

   Purpose: To provide site-specific information to the community.

   Actions Taken: The information repository was established at the following location:
   Northwestern Steel and Wire Company
   121 Wallace Street, P.O. Box 618
   Sterling, IL 61081-0618
   Telephone: (815) 625-2500

2. Objective: Respond to community concerns and needs that arise during

the Corrective Measures Implementation.

Technique: Monitor community concerns.

Purpose: To continually assess and address community concerns throughout the implementation of the corrective measures.

Action Taken: NWSW has identified David Long, Environmental Manager, as the contact person to whom citizens or groups can direct their written concerns and questions. NWSW has provided a telephone number for monitoring community concerns. The representative from NWSW remains accessible by telephone five days a week, Monday through Friday, from 8:00 a.m. to 5:00 p.m. at (815) 625-2500 ext. 2451.

3. Objective: Provide for effective management of the community relations program.

Technique: Management of community relations program.

Purpose: To address community concerns that emerge as a result of implementation of the corrective measures.

Action Taken: No community concerns have emerged during this period of the CMI. No comments or questions have been received during the period covered by this progress report.

FIGURE 3

SCHEDULE FOR FUTURE CMI ACTIVITIES

GROUNDWATER SAMPLING, SEMI-ANNUAL, 12 WELLS	**APRIL-MAY, 2001**
CMI PROGRESS REPORT	**SEPTEMBER-OCTOBER, 2001**
GROUNDWATER SAMPLING SEMI-ANNUAL, 6 WELLS	**OCTOBER-NOVEMBER, 2001**
CMI PROGRESS REPORT	**MARCH-APRIL, 2002**

Table 1. Northwestern Steel and Wire Company Pre-Rcra Landfill
Groundwater Sampling

Vinyl Chloride Analytical Results, ug/L

Monitoring Well	G101	G102	G103	G104	G105	G106	G107	G108	G109	G110	G111	G112	G113	G114	G115	G116	G117	G118
Permit Max.			**240**	**277**	**44**						**8**					**14**	**151**	
5/13-14/99		<2	75	200	20	<2		<2			<2	<2			<2	<2	78	<2
11/11/1999			140	87	13						12					28	89	
5/16-17/00		<5	52	36	19	<5		<5			<5	<5			<5	11	62	<5
11/14/2000			58	98	15						<5					17	98	
02/06/2001																14		

* Permit Maximum is the maximum concentration allowed by Section III (G)(1)(c) of the permit.

** Compound present below reporting limit

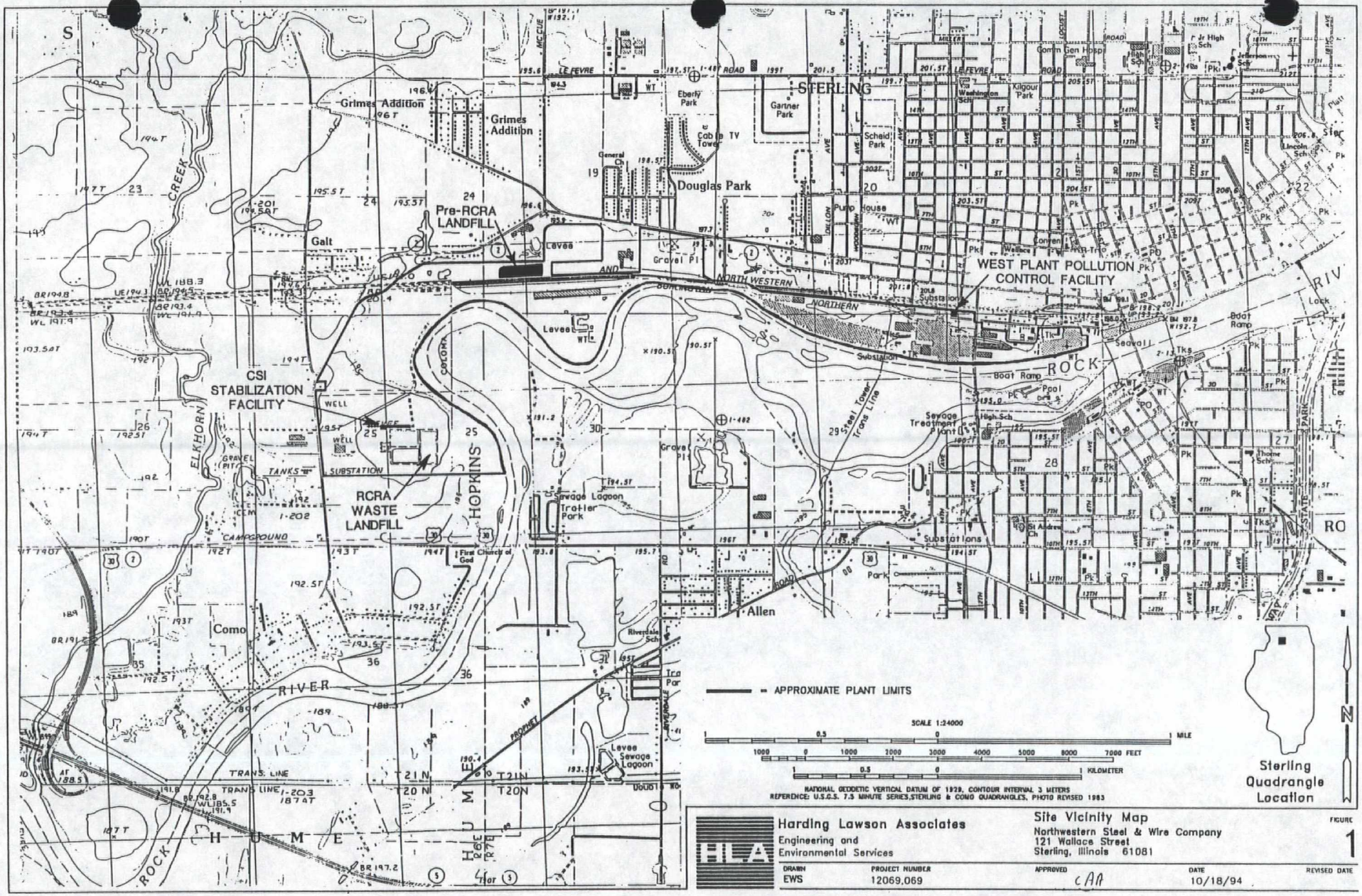
Table 2. Northwestern Steel and Wire Company Pre-Rcra Landfill
Groundwater Sampling

cis-1, 2 DCE Analytical Results, ug/L

Monitoring Well	G101	G102	G103	G104	G105	G106	G107	G108	G109	G110	G111	G112	G113	G114	G115	G116	G117	G118
Permit Max.																	97	
5/13-14/99		<5	16	27	19	<5		<5			20	<5			<5	33	24	5.6
11/11/1999			17	11	25						7.4					65	38	
5/16-17/00		<2	5	5	19	<2		<2			15	<2			5	28	12	<2
11/14/2000			<2	6	16						60					35	15	
02/06/2001																37		

* Permit Maximum is the maximum concentration allowed by Section III (G)(1)(c) of the permit.

** Compound present below reporting limit

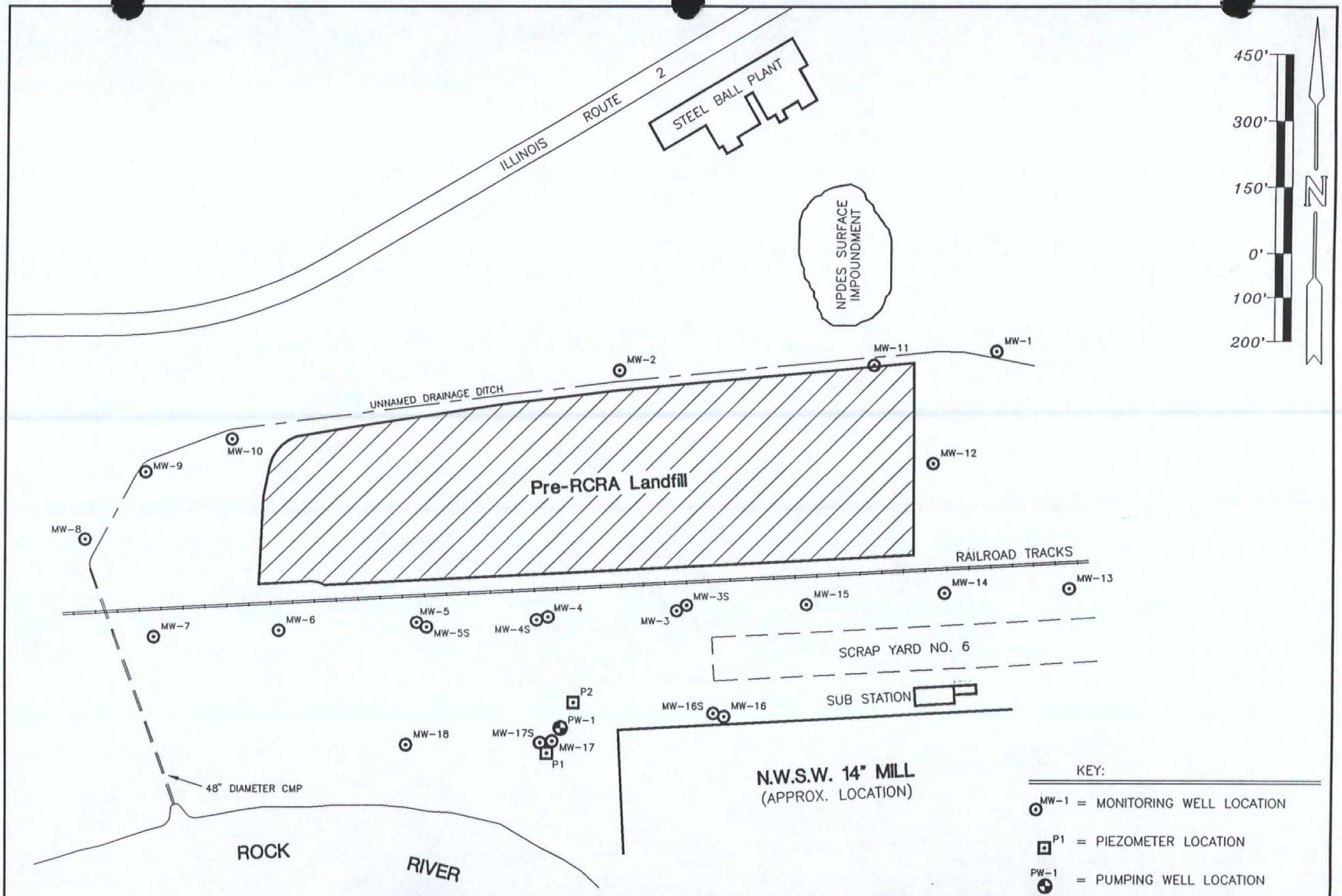


Harding Lawson Associates
Engineering and Environmental Services

Site Vicinity Map
Northwestern Steel & Wire Company
121 Wallace Street
Sterling, Illinois 61081

FIGURE 1

DRAWN	PROJECT NUMBER	APPROVED	DATE	REVISED DATE
EWS	12069.069	CAA	10/18/94	



Harding Lawson Associates
Engineering and Environmental Services

Location of Wells and Piezometers
Pre-RCRA Landfill
Northwestern Steel & Wire Company
Sterling, Illinois 61081

PLATE 3

DRAWN	PROJECT NUMBER	APPROVED	DATE	REVISED DATE
EWS	12069,12.2		06/17/93	

NORTHBROOK STEEL

STEEL AND WIRE COMPANY

January 15, 2001

Illinois Environmental Protection Agency
Bureau of Land
Planning and Reporting Section - #24
1021 North Grand Avenue East
P.O. Box 19276
Springfield, IL 62794-9276

RE: ILD 005 263 157
Site #195 05 00007

Dear Sirs:

As required by Title 35, Subpart G, Chapter I, Subchapter A, Section 724.198, please find three (3) copies of the results of the semi-annual groundwater sampling at our RCRA and pre-RCRA landfills on November 13-14, 2000. The pre-RCRA wells are identified by designations G101 through G118, while the RCRA wells are identified as G121 through G130. The pH at our RCRA landfill well G-130 has returned to slightly higher levels at 9.28. We will continue to watch this well since recent pH results have indicated higher than normal historical values. The vinyl chloride level at our G117 was 17 ug/L, which exceeds the permitted level of 14 ug/L. This well will be resampled to confirm the exceedance. If the resample exceeds 14 ug/L, the Agency will be contacted to discuss implementation of contingency measures.

If you have any questions, please feel free to contact me at extension 2451.

Respectfully Submitted,

David E. Long
Environmental Manager

Enclosures
CERTIFIED MAIL - RETURN RECEIPT REQUESTED
7099 3220 0010 5950 0493

121 Wallace Street • PO Box 618 • Sterling, Illinois 61081-0618 • USA
Phone (815) 625-2500

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF LAND POLLUTION CONTROL
CHEMICAL ANALYSIS FORM

RECORD CODE: L P C S M 0 1 (1–7) TRANS CODE: A (8)

REPORT DUE DATE: 01 (36 M) / 15 (D) / 01 (Y 41)

FEDERAL ID NUMBER: _____

SITE INVENTORY NUMBER: 1 9 5 0 5 0 0 0 0 7 (9–18)

MONITOR POINT NUMBER: G 1 0 3 (19 H M 58) (See instructions)

REGION: 1 CO.: Whiteside

DATE COLLECTED: 11 (23 M) / 14 (D) / 00 (Y 28)

FACILITY NAME: Northwestern Steel & Wire Company Pre-RCRA Landfill

FOR IEPA USE ONLY

LAB: _____ (29)

DATE RECEIVED: _____ (42 M) _____ (D) _____ (Y 47)

BACKGROUND SAMPLE (X): _____ (54) TIME COLLECTED (24 hr clock): 10 (55 H) : 30 (M 58)

UNABLE TO COLLECT SAMPLE (See instructions): _____ (59)

MONITOR POINT SAMPLED BY (See instructions): 3 (60) inertial pump (OTHER (Specify))

SAMPLE FIELD FILTERED-INORGANICS (X): _____ (61) ORGANICS(X): _____ (62)

SAMPLE APPEARANCE: (63–102)

COLLECTOR COMMENTS: (103–142)

LAB COMMENTS: (150–199)

RECORD CODE: L P C S M 0 2 (1–7) TRANS CODE: A (8) (COLUMNS 9-29 FROM ABOVE)

	FIELD MEASUREMENTS CONSTITUENT DESCRIPTION AND REQUIRED UNIT OF MEASURE	STORET NUMBER	REMARKS See Instr.	REPLICATE	< OR >	VALUE
Q	TEMP OF WATER (unfiltered F)	00011 (30–34)	(35)		(37)	53. (38–47)
Q	SPEC COND (unfiltered umhos)	00094				810.
Q	pH (unfiltered units)	00400				7.02
Q	ELEV OF GW SURF (ft ref MSL)	71993				613.26
Q	DEPTH OF WATER (ft below LS)	72019				14.46
A	BTM WELL ELEV (ft ref MSL)	72020				585.40
Q	DEPTH TO WATER FM MEA PT (ft)	72109				14.26

This agency is authorized to require this information under Illinois Revised Statutes, 1979, chapter 111 1/2, Section 1004 and 1021. Disclosure of this information is required. Failure to do so may result in a civil penalty up to $25,000 for each day the failure continues a fine up to $1,000 and imprisonment up to one year. This form has been approved by the Forms Management Center. *Only keypunch with Data in Column 35 of Columns 38-47.*

CHEMICAL ANALYSIS FORM

IEPA/DLPC

RECORD CODE (1–7) L P C S M 0 2 — TRANS CODE (8) A

SITE INVENTORY NUMBER (9–18) 1 9 5 0 5 0 0 0 0 7

MONITOR POINT NUMBER (19–22) G 1 0 3

CO. Whiteside

Northwestern Steel & Wire Company Pre-RCRA Landfill
FACILITY NAME

DATE COLLECTED (23 M / D / Y 28) 1 1 / 1 4 / 0 0

LAB (29) 1

	LAB MEASUREMENTS CONSTITUENT DESCRIPTION AND REQUIRED UNIT OF MEASURE	STORET NUMBER (30–34)	Rem (35)	Rep (36)	< or > (37)	Value (38–47)
	cis-1,2-Dichloroethylene	7 7 0 9 3			<	2
	Vinyl Chloride	3 9 1 7 5				5 8

All analytical procedures must be performed in accordance with the methods contained in "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods," SW-846, 3rd Edition, September 1986 or equivalent methods approved by the Agency. Proper sample chain of custody control and quality assurance/quality control procedures must be maintained in accordance with the facility sampling and analysis plan.

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF LAND POLLUTION CONTROL
CHEMICAL ANALYSIS FORM

RECORD CODE: L P C S M 0 1 (1–7) TRANS CODE: A (8)

REPORT DUE DATE: 01 (36 M) / 15 (D) / 01 (Y 41)

FEDERAL ID NUMBER

SITE INVENTORY NUMBER: 1 9 5 0 5 0 0 0 0 7 (9–18)

MONITOR POINT NUMBER: G 1 0 4 (See instructions) (19 H, M 58)

REGION: 1 CO.: Whiteside

DATE COLLECTED: 11 (23 M) / 14 (D) / 00 (Y 28)

FACILITY NAME: Northwestern Steel & Wire Company Pre-RCRA Landfill

FOR IEPA USE ONLY

LAB (29)

DATE RECEIVED (42 M, D, Y 47)

BACKGROUND SAMPLE (X) (54) TIME COLLECTED: 09 (55 H) : 55 (M 58) (24 hr clock)

UNABLE TO COLLECT SAMPLE (See instructions) (59)

MONITOR POINT SAMPLED BY: 3 (See instructions) (60) inertial pump (OTHER (Specify))

SAMPLE FIELD FILTERED-INORGANICS (X) (61) ORGANICS(X) (62)

SAMPLE APPEARANCE (63–102)

COLLECTOR COMMENTS (103–142)

LAB COMMENTS (150–199)

RECORD CODE: L P C S M 0 2 (1–7) TRANS CODE: A (8) (COLUMNS 9-29 FROM ABOVE)

	FIELD MEASUREMENTS CONSTITUENT DESCRIPTION AND REQUIRED UNIT OF MEASURE	STORET NUMBER (30–34)	REMARKS See Instr. (35)	REPLICATE	< OR > (37)	VALUE (38–47)
Q	TEMP OF WATER (unfiltered F)	00011				52.
Q	SPEC COND (unfiltered umhos)	00094				840.
Q	pH (unfiltered units)	00400				7.08
Q	ELEV OF GW SURF (ft ref MSL)	71993				614.95
Q	DEPTH OF WATER (ft below LS)	72019				13.09
A	BTM WELL ELEV (ft ref MSL)	72020				586.03
Q	DEPTH TO WATER FM MEA PT (ft)	72109				12.77

This agency is authorized to require this information under Illinois Revised Statutes, 1979, chapter 111 1/2, Section 1004 and 1021. Disclosure of this information is required. Failure to do so may result in a civil penalty up to $25,000 for each day the failure continues a fine up to $1,000 and imprisonment up to one year. This form has been approved by the Forms Management Center. *Only keypunch with Data in Column 35 of Columns 38-47.*

CHEMICAL ANALYSIS FORM

IEPA/DLPC

RECORD CODE L P C S M 0 2 (1–7) TRANS CODE A (8)

SITE INVENTORY NUMBER 1 9 5 0 5 0 0 0 0 7 (9–18) MONITOR POINT NUMBER G 1 0 4 (19–22)

CO. Whiteside

DATE COLLECTED 1 1 / 1 4 / 0 0 (23 M, D, Y 28)

Northwestern Steel & Wire Company Pre-RCRA Landfill
FACILITY NAME

LAB 1 (29)

	LAB MEASUREMENTS CONSTITUENT DESCRIPTION AND REQUIRED UNIT OF MEASURE	STORET NUMBER	Rem	Rep	< or >	Value
	cis-1,2-Dichloroethylene	7 7 0 9 3 (30–34)	(35)	(36)	(37)	(38) 6 . (47)
	Vinyl Chloride	3 9 1 7 5				9 8 .

All analytical procedures must be performed in accordance with the methods contained in "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods," SW-846, 3rd Edition, September 1986 or equivalent methods approved by the Agency. Proper sample chain of custody control and quality assurance/quality control procedures must be maintained in accordance with the facility sampling and analysis plan.

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF LAND POLLUTION CONTROL
CHEMICAL ANALYSIS FORM

RECORD CODE: L P C S M 0 1 (1–7) TRANS CODE: A (8)

REPORT DUE DATE: 01 / 15 / 01 (36 M / D / Y 41)

FEDERAL ID NUMBER: _____

SITE INVENTORY NUMBER: 1 9 5 0 5 0 0 0 0 7 (9–18)

MONITOR POINT NUMBER: G 1 0 5 (See instructions) (19 H M 58)

REGION: 1 CO.: Whiteside

DATE COLLECTED: 11 / 14 / 00 (23 M D Y 28)

FACILITY NAME: Northwestern Steel & Wire Company Pre-RCRA Landfill

FOR IEPA USE ONLY

LAB: _____ (29)

DATE RECEIVED: _____ (42 M D Y 47)

BACKGROUND SAMPLE (X): _____ (54) TIME COLLECTED: 09 : 25 (24 hr clock) (55 H M 58)

UNABLE TO COLLECT SAMPLE (See instructions): _____ (59)

MONITOR POINT SAMPLED BY: 3 (See instructions) (60) inertial pump (OTHER (Specify))

SAMPLE FIELD FILTERED-INORGANICS (X): _____ (61) ORGANICS(X): _____ (62)

SAMPLE APPEARANCE: (63–102)

COLLECTOR COMMENTS: (103–142)

LAB COMMENTS: (150–199)

RECORD CODE: L P C S M 0 2 (1–7) TRANS CODE: A (8) (COLUMNS 9-29 FROM ABOVE)

	FIELD MEASUREMENTS CONSTITUENT DESCRIPTION AND REQUIRED UNIT OF MEASURE	STORET NUMBER (30–34)	REMARKS See Instr. (35)	REPLICATE	< OR > (37)	VALUE (38–47)
Q	TEMP OF WATER (unfiltered F)	00011				50.
Q	SPEC COND (unfiltered umhos)	00094				910.
Q	pH (unfiltered units)	00400				7.05
Q	ELEV OF GW SURF (ft ref MSL)	71993				615.30
Q	DEPTH OF WATER (ft below LS)	72019				12.06
A	BTM WELL ELEV (ft ref MSL)	72020				578.72
Q	DEPTH TO WATER FM MEA PT (ft)	72109				11.72

This agency is authorized to require this information under Illinois Revised Statutes, 1979, chapter 111 1/2, Section 1004 and 1021. Disclosure of this information is required. Failure to do so may result in a civil penalty up to $25,000 for each day the failure continues a fine up to $1,000 and imprisonment up to one year. This form has been approved by the Forms Management Center. *Only keypunch with Data in Column 35 of Columns 38-47.*

CHEMICAL ANALYSIS FORM

IEPA/DLPC

RECORD CODE L P C S M 0 2 (1–7) TRANS CODE A (8)

SITE INVENTORY NUMBER 1 9 5 0 5 0 0 0 0 7 (9–18)

MONITOR POINT NUMBER G 1 0 5 (19–22)

CO. Whiteside

DATE COLLECTED 1 1 / 1 4 / 0 0 (23 M / D / Y 28)

Northwestern Steel & Wire Company Pre-RCRA Landfill
FACILITY NAME

LAB 1 (29)

	LAB MEASUREMENTS CONSTITUENT DESCRIPTION AND REQUIRED UNIT OF MEASURE	STORET NUMBER	Rem	Rep	< or >	Value
	cis-1,2-Dichloroethylene	7 7 0 9 3 (30–34)	(35)	(36)	(37)	(38) 1 6 . (47)
	Vinyl Chloride	3 9 1 7 5				1 5 .

All analytical procedures must be performed in accordance with the methods contained in "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods," SW-846, 3rd Edition, September 1986 or equivalent methods approved by the Agency. Proper sample chain of custody control and quality assurance/quality control procedures must be maintained in accordance with the facility sampling and analysis plan.

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF LAND POLLUTION CONTROL
CHEMICAL ANALYSIS FORM

RECORD CODE: L P C S M 0 1 (1–7) TRANS CODE: A (8)

REPORT DUE DATE: 0 1 (36 M) / 1 5 (D) / 0 1 (Y 41)

FEDERAL ID NUMBER: _____

SITE INVENTORY NUMBER: 1 9 5 0 5 0 0 0 0 7 (9–18)

MONITOR POINT NUMBER: G 1 1 1 (19 H, M 58) (See instructions)

REGION: 1 CO.: Whiteside

DATE COLLECTED: 1 1 (23 M) / 1 4 (D) / 0 0 (Y 28)

FACILITY NAME: Northwestern Steel & Wire Company Pre-RCRA Landfill

FOR IEPA USE ONLY

LAB: _____ (29)

DATE RECEIVED: _____ (42 M) _____ (D) _____ (Y 47)

BACKGROUND SAMPLE (X): _____ (54) TIME COLLECTED: 1 0 : 5 0 (55 H, M 58) (24 hr clock)

UNABLE TO COLLECT SAMPLE: _____ (59) (See instructions)

MONITOR POINT SAMPLED BY: A (60) (See instructions) _____ OTHER (Specify)

SAMPLE FIELD FILTERED-INORGANICS (X): _____ (61) ORGANICS(X): _____ (62)

SAMPLE APPEARANCE: (63–102)

COLLECTOR COMMENTS: (103–142)

LAB COMMENTS: (150–199)

RECORD CODE: L P C S M 0 2 (1–7) TRANS CODE: A (8) (COLUMNS 9-29 FROM ABOVE)

	FIELD MEASUREMENTS CONSTITUENT DESCRIPTION AND REQUIRED UNIT OF MEASURE	STORET NUMBER (30–34)	REMARKS See Instr. (35)	REPLICATE	< OR > (37)	VALUE (38–47)
Q	TEMP OF WATER (unfiltered F)	0 0 0 1 1				5 4 .
Q	SPEC COND (unfiltered umhos)	0 0 0 9 4				1 0 1 0 .
Q	pH (unfiltered units)	0 0 4 0 0				7 . 0 1
Q	ELEV OF GW SURF (ft ref MSL)	7 1 9 9 3				6 1 7 . 4 9
Q	DEPTH OF WATER (ft below LS)	7 2 0 1 9				3 . 5 7
A	BTM WELL ELEV (ft ref MSL)	7 2 0 2 0				6 0 6 . 9 2
Q	DEPTH TO WATER FM MEA PT (ft)	7 2 1 0 9				5 . 7 2

This agency is authorized to require this information under Illinois Revised Statutes, 1979, chapter 111 1/2, Section 1004 and 1021. Disclosure of this information is required. Failure to do so may result in a civil penalty up to $25,000 for each day the failure continues a fine up to $1,000 and imprisonment up to one year. This form has been approved by the Forms Management Center. *Only keypunch with Data in Column 35 of Columns 38-47.*

CHEMICAL ANALYSIS FORM

IEPA/DLPC

RECORD CODE L P C S M 0 2 (1–7) TRANS CODE A (8)

SITE INVENTORY NUMBER 1 9 5 0 5 0 0 0 0 7 (9–18) MONITOR POINT NUMBER G 1 1 1 (19–22)

CO. Whiteside

DATE COLLECTED 1 1 / 1 4 / 0 0 (23–28: M / D / Y)

Northwestern Steel & Wire Company Pre-RCRA Landfill
FACILITY NAME

LAB 1 (29)

	LAB MEASUREMENTS CONSTITUENT DESCRIPTION AND REQUIRED UNIT OF MEASURE	STORET NUMBER	Rem	Rep	< or >	Value
	cis-1,2-Dichloroethylene	7 7 0 9 3 (30–34)	(35)	(36)	(37)	6 0 . (38–47)
	Vinyl Chloride	3 9 1 7 5			<	5 .
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ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF LAND POLLUTION CONTROL
CHEMICAL ANALYSIS FORM

RECORD CODE: L P C S M 0 1 (1–7) | TRANS CODE: A (8)

REPORT DUE DATE: 0 1 / 1 5 / 0 1 (36 M / D / Y 41)

FEDERAL ID NUMBER: _____

SITE INVENTORY NUMBER: 1 9 5 0 5 0 0 0 0 7 (9–18)

MONITOR POINT NUMBER: G 1 1 6 (See instructions) (19 H M 58)

REGION: 1 CO.: Whiteside

DATE COLLECTED: 1 1 / 1 4 / 0 0 (23 M / D / Y 28)

FACILITY NAME: Northwestern Steel & Wire Company Pre-RCRA Landfill

FOR IEPA USE ONLY

LAB: _____ (29)

DATE RECEIVED: _____ (42 M / D / Y 47)

BACKGROUND SAMPLE (X): _____ (54) TIME COLLECTED: 0 8 : 5 5 (24 hr clock) (55 H M 58)

UNABLE TO COLLECT SAMPLE: _____ (See instructions) (59)

MONITOR POINT SAMPLED BY: 3 (See instructions) (60) inertial pump (OTHER (Specify))

SAMPLE FIELD FILTERED-INORGANICS (X): _____ (61) ORGANICS(X): _____ (62)

SAMPLE APPEARANCE: (63–102)

COLLECTOR COMMENTS: (103–142)

LAB COMMENTS: (150–199)

RECORD CODE: L P C S M 0 2 (1–7) | TRANS CODE: A (8) (COLUMNS 9-29 FROM ABOVE)

	FIELD MEASUREMENTS CONSTITUENT DESCRIPTION AND REQUIRED UNIT OF MEASURE	STORET NUMBER (30–34)	REMARKS See Instr. (35)	REPLICATE	< OR > (37)	VALUE (38–47)
Q	TEMP OF WATER (unfiltered F)	0 0 0 1 1				4 9 .
Q	SPEC COND (unfiltered umhos)	0 0 0 9 4				8 2 0 .
Q	pH (unfiltered units)	0 0 4 0 0				6 . 9 4
Q	ELEV OF GW SURF (ft ref MSL)	7 1 9 9 3				6 1 2 . 6 9
Q	DEPTH OF WATER (ft below LS)	7 2 0 1 9				1 4 . 2 3
A	BTM WELL ELEV (ft ref MSL)	7 2 0 2 0				5 7 8 . 5 7
Q	DEPTH TO WATER FM MEA PT (ft)	7 2 1 0 9				1 3 . 9 1

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CHEMICAL ANALYSIS FORM

IEPA/DLPC

RECORD CODE (1–7) L P C S M 0 2 — TRANS CODE (8) A

SITE INVENTORY NUMBER (9–18) 1 9 5 0 5 0 0 0 0 7

MONITOR POINT NUMBER (19–22) G 1 1 6

CO. Whiteside

DATE COLLECTED (23–28) 1 1 / 1 4 / 0 0

Northwestern Steel & Wire Company Pre-RCRA Landfill
FACILITY NAME

LAB (29) 1

	LAB MEASUREMENTS CONSTITUENT DESCRIPTION AND REQUIRED UNIT OF MEASURE	STORET NUMBER (30–34)	Rem (35)	Rep (36)	< or > (37)	Value (38–47)
	cis-1,2-Dichloroethylene	7 7 0 9 3				3 5 .
	Vinyl Chloride	3 9 1 7 5				1 7 .
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All analytical procedures must be performed in accordance with the methods contained in "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods," SW-846, 3rd Edition, September 1986 or equivalent methods approved by the Agency. Proper sample chain of custody control and quality assurance/quality control procedures must be maintained in accordance with the facility sampling and analysis plan.

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF LAND POLLUTION CONTROL
CHEMICAL ANALYSIS FORM

RECORD CODE: L P C S M 0 1 (1–7) TRANS CODE: A (8)

REPORT DUE DATE: 0 1 (36 M) / 1 5 (D) / 0 1 (Y 41)

FEDERAL ID NUMBER: _____

SITE INVENTORY NUMBER: 1 9 5 0 5 0 0 0 0 7 (9–18)

MONITOR POINT NUMBER: G 1 1 7 (See instructions) (19 H, M 58)

REGION: 1 CO.: Whiteside

DATE COLLECTED: 1 1 (23 M) / 1 4 (D) / 0 0 (Y 28)

FACILITY NAME: Northwestern Steel & Wire Company Pre-RCRA Landfill

FOR IEPA USE ONLY

LAB: _____ (29)

DATE RECEIVED: _____ (42 M, D, Y 47)

BACKGROUND SAMPLE (X): _____ (54) TIME COLLECTED (24 hr clock): 0 8 : 2 0 (55 H, M 58)

UNABLE TO COLLECT SAMPLE (See instructions): _____ (59)

MONITOR POINT SAMPLED BY (See instructions): 3 (60) inertial pump (OTHER (Specify))

SAMPLE FIELD FILTERED-INORGANICS (X): _____ (61) ORGANICS(X): _____ (62)

SAMPLE APPEARANCE: (63–102)

COLLECTOR COMMENTS: (103–142)

LAB COMMENTS: (150–199)

RECORD CODE: L P C S M 0 2 (1–7) TRANS CODE: A (8) (COLUMNS 9-29 FROM ABOVE)

	FIELD MEASUREMENTS CONSTITUENT DESCRIPTION AND REQUIRED UNIT OF MEASURE	STORET NUMBER (30–34)	REMARKS See Instr. (35)	REPLICATE	< OR > (37)	VALUE (38–47)
Q	TEMP OF WATER (unfiltered F)	0 0 0 1 1				5 3 .
Q	SPEC COND (unfiltered umhos)	0 0 0 9 4				9 3 0 .
Q	pH (unfiltered units)	0 0 4 0 0				6 . 7 6
Q	ELEV OF GW SURF (ft ref MSL)	7 1 9 9 3				6 1 2 . 5 5
Q	DEPTH OF WATER (ft below LS)	7 2 0 1 9				1 2 . 8 6
A	BTM WELL ELEV (ft ref MSL)	7 2 0 2 0				5 9 0 . 7 9
Q	DEPTH TO WATER FM MEA PT (ft)	7 2 1 0 9				1 2 . 4 2

This agency is authorized to require this information under Illinois Revised Statutes, 1979, chapter 111 1/2, Section 1004 and 1021. Disclosure of this information is required. Failure to do so may result in a civil penalty up to $25,000 for each day the failure continues a fine up to $1,000 and imprisonment up to one year. This form has been approved by the Forms Management Center. *Only keypunch with Data in Column 35 of Columns 38-47.*

CHEMICAL ANALYSIS FORM

IEPA/DLPC

RECORD CODE (1–7) L P C S M 0 2 — TRANS CODE (8) A

SITE INVENTORY NUMBER (9–18) 1 9 5 0 5 0 0 0 0 7 — MONITOR POINT NUMBER (19–22) G 1 1 7

CO. Whiteside

Northwestern Steel & Wire Company Pre-RCRA Landfill
FACILITY NAME

DATE COLLECTED (23–28) 1 1 / 1 4 / 0 0 (M / D / Y)

LAB (29) 1

	LAB MEASUREMENTS CONSTITUENT DESCRIPTION AND REQUIRED UNIT OF MEASURE	STORET NUMBER (30–34)	Rem (35)	Rep (36)	< or > (37)	Value (38–47)
	cis-1,2-Dichloroethylene	7 7 0 9 3				1 5 .
	Vinyl Chloride	3 9 1 7 5				9 8 .
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All analytical procedures must be performed in accordance with the methods contained in "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods," SW-846, 3rd Edition, September 1986 or equivalent methods approved by the Agency. Proper sample chain of custody control and quality assurance/quality control procedures must be maintained in accordance with the facility sampling and analysis plan.

PDC Laboratories, Inc.
P.O. Box 9071 • Peoria, IL 61612-9071
(309) 692-9688 • (800) 752-6651 • FAX (309) 692-9689

Report Cover Page

Northwestern Steel & Wire Co.
121 Wallace Street

Sterling, IL 61081

Attn: Mr. Dave Long

Date Received: 14-Nov-00
Date Reported: 28-Nov-00
PO #: H2 00 -63878
PDC Cust. # : 275706

Login No. 00112188

This report includes information regarding the following described samples as received by the laboratory and is only valid for the parameters tested. This report contains 8 results page(s) not including the cover page(s).

Sample No.	Client ID	Site	Locator	Tests/Services
00112188-1	SEMIANNUAL	PRE-RCRA LF	MW 3	Volatiles, GC/MS
00112188-2	SEMIANNUAL	PRE-RCRA LF	MW 4	Volatiles, GC/MS
00112188-3	SEMIANNUAL	PRE-RCRA LF	MW 5	Volatiles, GC/MS
00112188-4	SEMIANNUAL	PRE-RCRA LF	MW 11	Volatiles, GC/MS
00112188-5	SEMIANNUAL	PRE-RCRA LF	MW 16	Volatiles, GC/MS
00112188-6	SEMIANNUAL	PRE-RCRA LF	MW 17	Volatiles, GC/MS
00112188-7	SEMIANNUAL	PRE-RCRA LF	FIELD DUPLICATE	Volatiles, GC/MS
00112188-8	SEMIANNUAL	PRE-RCRA LF	FIELD BLANK	Volatiles, GC/MS

Certified by: _____
Kurt C. Stepping, Director of Client Services

PDC Laboratories participates in the following laboratory accreditation/certification and proficiency programs. Endorsement by the Federal or State Government or their agencies is not implied.

State of Illinois Chemical Analysis in Drinking Water Accredited Lab. No. 100230
State of Illinois Bacteriological Analysis in Drinking Water Certified Lab Registry No. 17533
State of Arkansas Certified Wastewater and Hazardous Waste Lab
State of Indiana Certified Drinking Water Lab No. C-IL-04
State of Iowa Certified Wastewater Lab No. 240
American Industrial Hygiene Association Bulk/Air Asbestos Proficiency Program Lab ID No. 101206
State of North Dakota Wastewater and Hazardous Waste CertifiedLab No. R-094
State of Wisconsin Certified Wastewater and Hazardous Waste Lab ID No. 998294430

PDC Laboratories, Inc.
P.O. Box 9071 • Peoria, IL 61612-9071
(309) 692-9688 • (800) 752-6651 • FAX (309) 692-9689

Laboratory Results

Northwestern Steel & Wire Co.
121 Wallace Street

Sterling, IL 61081

Attn: Mr. Dave Long

Date Received: 14-Nov-00
Date Reported: 28-Nov-00
PO #: H2 00 -63878
PDC Cust. # : 275706

Login No. 00112188

Sample No: 00112188-1
Client ID: SEMIANNUAL
Site: PRE-RCRA LF
Locator: MW 3
Collect Date: 14-NOV-00 10:30

Parameter		Result	Units	Date	By
SW-846 Method 8260B					
Vinyl chloride		58.	ug/l	16-Nov-00 07:36	TJP
cis-1,2-Dichloroethene	<	2.0	ug/l	16-Nov-00 07:36	TJP

PDC Laboratories, Inc.
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Laboratory Results

Northwestern Steel & Wire Co.
121 Wallace Street

Sterling, IL 61081

Attn: Mr. Dave Long

Date Received: 14-Nov-00
Date Reported: 28-Nov-00
PO #: H2 00 -63878
PDC Cust. # : 275706

Login No. 00112188

Sample No: 00112188-2
Client ID: SEMIANNUAL
Site: PRE-RCRA LF
Locator: MW 4
Collect Date: 14-NOV-00 09:55

Parameter	Result	Units	Date	By
SW-846 Method 8260B				
Vinyl chloride	98.	ug/l	16-Nov-00 07:36	TJP
cis-1,2-Dichloroethene	6.0	ug/l	16-Nov-00 07:36	TJP

PDC Laboratories, Inc.
P.O. Box 9071 • Peoria, IL 61612-9071
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Laboratory Results

Northwestern Steel & Wire Co.
121 Wallace Street

Sterling, IL 61081

Attn: Mr. Dave Long

Date Received: 14-Nov-00
Date Reported: 28-Nov-00
PO #: H2 00 -63878
PDC Cust. # : 275706

Login No. 00112188

Sample No: 00112188-3
Client ID: SEMIANNUAL
Site: PRE-RCRA LF
Locator: MW 5
Collect Date: 14-NOV-00 09:25

Parameter	Result	Units	Date	By
SW-846 Method 8260B				
Vinyl chloride	15.	ug/l	16-Nov-00 07:36	TJP
cis-1,2-Dichloroethene	16.	ug/l	16-Nov-00 07:36	TJP

PDC Laboratories, Inc.
P.O. Box 9071 • Peoria, IL 61612-9071
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Laboratory Results

Northwestern Steel & Wire Co.
121 Wallace Street

Sterling, IL 61081

Attn: Mr. Dave Long

Date Received: 14-Nov-00
Date Reported: 28-Nov-00
PO #: H2 00 -63878
PDC Cust. # : 275706

Login No. 00112188

Sample No: 00112188-4
Client ID: SEMIANNUAL
Site: PRE-RCRA LF
Locator: MW 11
Collect Date: 14-NOV-00 10:50

Parameter		Result	Units	Date	By
SW-846 Method 8260B					
Vinyl chloride	<	5.0	ug/l	16-Nov-00 07:36	TJP
cis-1,2-Dichloroethene		60.	ug/l	16-Nov-00 07:36	TJP

PDC Laboratories, Inc.
P.O. Box 9071 • Peoria, IL 61612-9071
(309) 692-9688 • (800) 752-6651 • FAX (309) 692-9689

Laboratory Results

Northwestern Steel & Wire Co.
121 Wallace Street

Sterling, IL 61081

Attn: Mr. Dave Long

Date Received: 14-Nov-00
Date Reported: 28-Nov-00
PO #: H2 00 -63878
PDC Cust. # : 275706

Login No. 00112188

Sample No: 00112188-5
Client ID: SEMIANNUAL
Site: PRE-RCRA LF
Locator: MW 16
Collect Date: 14-NOV-00 08:55

Parameter	Result	Units	Date	By
SW-846 Method 8260B				
Vinyl chloride	17.	ug/l	16-Nov-00 07:36	TJP
cis-1,2-Dichloroethene	35.	ug/l	16-Nov-00 07:36	TJP

PDC Laboratories, Inc.
P.O. Box 9071 • Peoria, IL 61612-9071
(309) 692-9688 • (800) 752-6651 • FAX (309) 692-9689

Laboratory Results

Northwestern Steel & Wire Co.
121 Wallace Street

Sterling, IL 61081

Attn: Mr. Dave Long

Date Received: 14-Nov-00
Date Reported: 28-Nov-00
PO #: H2 00 -63878
PDC Cust. # : 275706

Login No. 00112188

Sample No: 00112188-6
Client ID: SEMIANNUAL
Site: PRE-RCRA LF
Locator: MW 17
Collect Date: 14-NOV-00 08:20

Parameter	Result	Units	Date	By
SW-846 Method 8260B				
Vinyl chloride	98.	ug/l	16-Nov-00 07:36	TJP
cis-1,2-Dichloroethene	15.	ug/l	16-Nov-00 07:36	TJP

PDC Laboratories, Inc.
P.O. Box 9071 • Peoria, IL 61612-9071
(309) 692-9688 • (800) 752-6651 • FAX (309) 692-9689

Laboratory Results

Northwestern Steel & Wire Co.
121 Wallace Street

Sterling, IL 61081

Attn: Mr. Dave Long

Date Received: 14-Nov-00
Date Reported: 28-Nov-00
PO #: H2 00 -63878
PDC Cust. # : 275706

Login No. 00112188

Sample No: 00112188-7
Client ID: SEMIANNUAL
Site: PRE-RCRA LF
Locator: FIELD DUPLICATE
Collect Date: 14-NOV-00 08:25

Parameter	Result	Units	Date	By
SW-846 Method 8260B				
Vinyl chloride	94.	ug/l	16-Nov-00 07:36	TJP
cis-1,2-Dichloroethene	15.	ug/l	16-Nov-00 07:36	TJP

PDC Laboratories, Inc.
P.O. Box 9071 • Peoria, IL 61612-9071
(309) 692-9688 • (800) 752-6651 • FAX (309) 692-9689

Laboratory Results

Northwestern Steel & Wire Co.
121 Wallace Street

Sterling, IL 61081

Attn: Mr. Dave Long

Date Received: 14-Nov-00
Date Reported: 28-Nov-00
PO #: H2 00 -63878
PDC Cust. # : 275706

Login No. 00112188

Sample No: 00112188-8
Client ID: SEMIANNUAL
Site: PRE-RCRA LF
Locator: FIELD BLANK
Collect Date: 14-NOV-00 08:30

Parameter		Result	Units	Date	By
SW-846 Method 8260B					
Vinyl chloride	<	5.0	ug/l	16-Nov-00 07:36	TJP
cis-1,2-Dichloroethene	<	2.0	ug/l	16-Nov-00 07:36	TJP

PDC LABORATORIES, INC.
2231 W[illegible] ALTORFER DRIVE
PEORIA, IL 61615

PHONE # 309-692-9688
FAX # 309-692-9689

CHAIN OF CUSTODY RECORD

ALL SHADED AREAS MUST BE COMPLETED BY CLIENT (PLEASE PRINT)

(1) CLIENT	PROJECT NUMBER	P.O. NUMBER	MEANS SHIPPED
NWSW - Pre RCRA			
ADDRESS	PHONE NUMBER	FAX NUMBER	DATE SHIPPED
CITY STATE ZIP	SAMPLER (PLEASE PRINT) DAVE Calhoun	MATRIX TYPES: WW-WASTEWATER DW-DRINKING WATER GW-GROUND WATER WWSL-SLUDGE NAS-SOLID OTHER	
CONTACT PERSON	SAMPLER'S SIGNATURE Dave Calh		

(3) ANALYSIS REQUESTED — VOA's

(4) (FOR LAB USE ONLY)
LOGIN # 00112188
LOGGED BY: MRK
LAB PROJ. #
TEMPLATE:
PROJ. MGR.:

(2) SAMPLE DESCRIPTION	DATE COLLECTED	TIME COLLECTED	SAMPLE TYPE GRAB	SAMPLE TYPE COMP	MATRIX TYPE	TOTAL # OF CONT	REMARKS
MW 3	11-14	1030				3	
MW 4		0955				3	
MW 5		0925				3	
MW 111		1050				3	
MW 16		0855				3	
MW 17		0820				3	
Dupe		0825				3	
Field Blank		0830				3	

(5) TURNAROUND TIME REQUESTED (PLEASE CIRCLE) NORMAL RUSH
(RUSH TAT IS SUBJECT TO PDC LABS APPROVAL AND SURCHARGE)
RUSH RESULTS VIA (PLEASE CIRCLE) FAX PHONE
FAX # IF DIFFERENT FROM ABOVE: PHONE # IF DIFFERENT FROM ABOVE:

(6) *The sample temperature will be measured upon receipt at the lab. By initialing this area you request that the lab notify you, before proceeding with analysis, if the sample temperature is outside of the range of 0.1-6.0°C. By not initialing this area you allow the lab to proceed with analytical testing regardless of the sample temperature.*

(7) RELINQUISHED BY: (SIGNATURE)	DATE	TIME	RECEIVED BY: (SIGNATURE)	DATE	TIME
Dave Calh	11-14-00	1500			
RELINQUISHED BY: (SIGNATURE)	DATE	TIME	RECEIVED AT LAB BY: (SIGNATURE)	DATE	TIME
			Lisa Pettaway	11/14/00	15:00

(8) COMMENTS: (FOR LAB USE ONLY)

SAMPLE TEMPERATURE UPON RECEIPT 3 °C
CHILL PROCESS STARTED PRIOR TO RECEIPT Y OR N
SAMPLE(S) RECEIVED ON ICE Y OR N
BOTTLES RECEIVED IN GOOD CONDITION Y OR N
BOTTLES FILLED WITH ADEQUATE VOLUME Y OR N
SAMPLES RECEIVED WITHIN HOLD TIME(S) Y OR N

PAGE _____ OF _____

NORTHWESTERN STEEL AND WIRE COMPANY
Sterling, Illinois

GROUND WATER FIELD SURVEY FORM

Federal I. D. ILD005263157
Ill Site 1950500007

Sample Point I.D. MW 17
Purge Date 11-14-02
Purge Time 755
Sample Date 11-14-02
Sample Time 0820

Casing Vol. (gals) 21.76 3.4 (10.5)
Vol. Purged (gals) 10.5
Sample Method Waterra
Seal No.

Elevation
Water Level 12.42
GW Elevation

Total Well Depth 34.18
Stick-Up
Sample Temp. (°C)

Weather Conditions Cloudy Snow Windy 15+ mph W
Sample Appearance Clear
Sampler Comments no odor well OK

Unable To Obtain Sample (X)
Sample Composited (X)

Reason
Procedure/Proportions

	1		2	3
pH	7.45	7.30	~~5.02~~ 6.85	~~3.95~~ ~~4.15~~ 6.76
Sp. Cond (umhos)	7.60	7.50	7.50	9.30
	11.8	11.5	11.4	11.4

Lab pH very erratic Dropping very fast

Comments

Fld/o Dupe

Filtrd field Blank @ 0830

I certify that sampling procedures were in accordance with EPA and corporate protocols.

Sampler Name (print) DRL Signature Dave Call

NORTHWESTERN STEEL AND WIRE COMPANY
Sterling, Illinois

GROUND WATER FIELD SURVEY FORM

Federal I. D. ILD005263157
Ill Site 1950500007

Sample Point I.D. MW 16
Purge Date 11-14-00
Purge Time 0830
Sample Date 11-14-00
Sample Time 0855

Casing Vol. (gals) 34.12 5.4 (16)
Vol. Purged (gals) 16
Sample Method Waterra
Seal No.

Elevation
Water Level 13.91
GW Elevation

Total Well Depth 48.03
Stick-Up
Sample Temp. (°C)

Weather Conditions Cloudy Windy 15+ W Snow
Sample Appearance Clear
Sampler Comments No ODOR

Unable To Obtain Sample (X)
Sample Composited (X)

Reason
Procedure/Proportions

	I	1	2	3
pH	1.55	6.80	6.97	6.94
Sp. Cond (umhos)	780	825	810	820
TEMP	9.7	9.7	9.6	9.4

Lab pH seems Low but checked Against STD

Comments

I certify that sampling procedures were in accordance with EPA and corporate protocols.

Sampler Name (print) DRC Signature Dave Call

NORTHWESTERN STEEL AND WIRE COMPANY
Sterling, Illinois

GROUND WATER FIELD SURVEY FORM

Federal I. D. ILD005263157
Ill Site 1950500007

Sample Point I.D. MW 5
Purge Date 11-14-00
Purge Time 0900
Sample Date 11-14-06
Sample Time 0925

Casing Vol. (gals) 36.58 6 (18)
Vol. Purged (gals) 18
Sample Method Waterra
Seal No.

Elevation
Water Level 11.72
GW Elevation

Total Well Depth 48.36
Stick-Up
Sample Temp. (°C)

Weather Conditions Cloudy Windy 15+ W Snow
Sample Appearance Clear
Sampler Comments No odor

Unable To Obtain Sample (X)
Sample Composited (X)

Reason
Procedure/Proportions

	I	1	2	3
pH	7.11	6.93	7.01	7.05
Sp. Cond (umhos)	640	900	900	910
Temp	9.7	10.0	10.2	10.1

Lab

Comments

I certify that sampling procedures were in accordance with EPA and corporate protocols.

Sampler Name (print) DRC Signature Dave Calhoun

NORTHWESTERN STEEL AND WIRE COMPANY
Sterling, Illinois

GROUND WATER FIELD SURVEY FORM

Federal I. D. ILD005263157
Ill Site 1950500007

Sample Point I.D. MW-4
Purge Date 11-14-00
Purge Time 0930
Sample Date 11-14-00
Sample Time 0955

Casing Vol. (gals) 28.92 4.6 13.8
Vol. Purged (gals) 14
Sample Method Waterra
Seal No.

Elevation
Water Level 12.77
GW Elevation

Total Well Depth 41.69
Stick-Up
Sample Temp. (°C)

Weather Conditions Cloudy Windy 15+ W Snow
Sample Appearance Clear
Sampler Comments slight odor

Unable To Obtain Sample (X)
Sample Composited (X)

Reason
Procedure/Proportions

	I	1	2	3
pH	6.92	6.98	6.99	7.08
Sp. Cond (umhos)	920	890	870	840
Temp	10.7	11.1	11.1	11.0

Lab

Comments

I certify that sampling procedures were in accordance with EPA and corporate protocols.

Sampler Name (print) DRC Signature Dave Cobb

NORTHWESTERN STEEL AND WIRE COMPANY
Sterling, Illinois

GROUND WATER FIELD SURVEY FORM

Federal I. D. ILD005263157
Ill Site 1950500007

Sample Point I.D. MW-3
Purge Date 11-14-00
Purge Time 1000
Sample Date 11-14-0
Sample Time 1030

27.86 4.5 13.4
Casing Vol. (gals) 13.5
Vol. Purged (gals)
Sample Method Waterra
Seal No.

Elevation
Water Level 14.26
GW Elevation

Total Well Depth 42.12
Stick-Up
Sample Temp. (°C)

Weather Conditions Cloudy Wind 15+ W
Sample Appearance Clear
Sampler Comments no odor well ok

Unable To Obtain Sample (X)
Sample Composited (X)

Reason
Procedure/Proportions

	I	1	2	3
pH	6.98	6.94	7.04	7.02
Sp. Cond (umhos)	800	820	800	810
TEMP	12.1	12.1	12.0	11.9

Lab 370 4904

Comments

I certify that sampling procedures were in accordance with EPA and corporate protocols.

Sampler Name (print) DRC Signature

NORTHWESTERN STEEL AND WIRE COMPANY
Sterling, Illinois

GROUND WATER FIELD SURVEY FORM

Federal I. D. ILD005263157
Ill Site 1950500007

Sample Point I.D. MW 111
Purge Date 11-14-00
Purge Time 1035
Sample Date 11-14-00
Sample Time 1050

Casing Vol. (gals) 10.57 1.7 (5)
Vol. Purged (gals) 5
Sample Method Bailer
Seal No.

Elevation
Water Level 5.72
GW Elevation

Total Well Depth 16.29
Stick-Up
Sample Temp. (°C)

Weather Conditions Cloudy Windy 15+ W
Sample Appearance Very turbid Grey SEDiment
Sampler Comments Slight odor

Unable To Obtain Sample (X)
Sample Composited (X)

Reason
Procedure/Proportions

	I	1	2	3
pH	6.91	6.95	6.97	7.01
Sp. Cond (umhos)	1060	980	1050	1010
Temp	12.1	12.1	12.1	12.0

Lab

Comments

I certify that sampling procedures were in accordance with EPA and corporate protocols.

Sampler Name (print) DRC Signature Dan Call

PDC Laboratories, Inc.
P.O. Box 9071 • Peoria, IL 61612-9071
309) 692-9688 • (800) 752-6651 • FAX (309) 692-9689

Report Cover Page

Northwestern Steel & Wire Co.
121 Wallace Street

Sterling, IL 61081

Attn: Mr. Dave Long

Date Received: 06-Feb-01
Date Reported: 08-Feb-01
PO #: H2 00 -63878
PDC Cust. # : 275706

Login No. 01021469

This report includes information regarding the following described samples as received by the laboratory and is only valid for the parameters tested. This report contains 1 results page(s) not including the cover page(s).

Sample No.	Client ID	Site	Locator	Tests/Services
01021469-1	GROUND WATER	MW-116	RESAMPLE	Volatiles, GC/MS

Certified by: _____
Kurt C. Stepping, Director of Client Services

PDC Laboratories participates in the following laboratory accreditation/certification and proficiency programs. Endorsement by the Federal or State Government or their agencies is not implied.

State of Illinois Chemical Analysis in Drinking Water Accredited Lab. No. 100230
State of Illinois Bacteriological Analysis in Drinking Water Certified Lab Registry No. 17533
State of Arkansas Certified Wastewater and Hazardous Waste Lab
State of Indiana Certified Drinking Water Lab No. C-IL-04
State of Iowa Certified Wastewater Lab No. 240
American Industrial Hygiene Association Bulk/Air Asbestos Proficiency Program Lab ID No. 101206
State of North Dakota Wastewater and Hazardous Waste CertifiedLab No. R-094
State of Wisconsin Certified Wastewater and Hazardous Waste Lab ID No. 998294430

PDC Laboratories, Inc.
P.O. Box 9071 • Peoria, IL 61612-9071
(309) 692-9688 • (800) 752-6651 • FAX (309) 692-9689

Laboratory Results

Northwestern Steel & Wire Co.
121 Wallace Street

Sterling, IL 61081

Attn: Mr. Dave Long

Date Received: 06-Feb-01
Date Reported: 08-Feb-01
PO #: H2 00 -63878

Login No. 01021469

Sample No: 01021469-1
Client ID: GROUND WATER
Site: MW-116
Locator: RESAMPLE
Collect Date: 06-FEB-01 13:40

Parameter	Result	Units	Date	By
SW-846 Method 8260B				
Vinyl chloride	14.	ug/l	07-Feb-01 08:37	TJP
cis-1,2-Dichloroethene	37.	ug/l	07-Feb-01 08:37	TJP

PDC LABORATORIES, INC.
2231 WEST ALTORFER DRIVE
PEORIA, IL 61615

PHONE # 309-692-9688
FAX # 309-692-9689

CHAIN OF CUSTODY RECORD

ALL SHADED AREAS MUST BE COMPLETED BY CLIENT (PLEASE PRINT)

1 CLIENT	PROJECT NUMBER	P.O. NUMBER	MEANS SHIPPED
NWSD Pre RCRA			
ADDRESS	PHONE NUMBER	FAX NUMBER	DATE SHIPPED
CITY STATE ZIP	SAMPLER (PLEASE PRINT): Dm Brewer	MATRIX TYPES: WW-WASTEWATER DW-DRINKING WATER GW-GROUND WATER WWSL-SLUDGE NAS-SOLID OTHER:	
CONTACT PERSON	SAMPLER'S SIGNATURE: Dm Brewer		

3 ANALYSIS REQUESTED

4 (FOR LAB USE ONLY)
LOGIN # 0602469-1
LOGGED BY: RMP
LAB PROJ. # NORTH-PRE
TEMPLATE:
PROJ. MGR.:

2 SAMPLE DESCRIPTION	DATE COLLECTED	TIME COLLECTED	SAMPLE TYPE GRAB	SAMPLE TYPE COMP	MATRIX TYPE	TOTAL # OF CONT	M8260	615 12 DCE + VINYL CHLORIDE ONLY							REMARKS
MW11C	2/6/00	1340			GW	3	X								Resamples

5 TURNAROUND TIME REQUESTED (PLEASE CIRCLE) NORMAL RUSH
(RUSH TAT IS SUBJECT TO PDC LABS APPROVAL AND SURCHARGE)
RUSH RESULTS VIA (PLEASE CIRCLE) FAX PHONE
FAX # IF DIFFERENT FROM ABOVE: PHONE # IF DIFFERENT FROM ABOVE:

6 *The sample temperature will be measured upon receipt at the lab. By initialing this area you request that the lab notify you, before proceeding with analysis, if the sample temperature is outside of the range of 0.1-6.0°C. By not initialing this area you allow the lab to proceed with analytical testing regardless of the sample temperature.* _____

7	DATE		DATE
RELINQUISHED BY: (SIGNATURE) Dm Brewer	2/6	RECEIVED BY: (SIGNATURE)	
	TIME 1545		TIME
RELINQUISHED BY: (SIGNATURE)	DATE	RECEIVED AT LAB BY: (SIGNATURE) Linda Peterson	DATE 2/6/01
	TIME		TIME 3:45 pm

8 COMMENTS: (FOR LAB USE ONLY)

SAMPLE TEMPERATURE UPON RECEIPT 9 °C
CHILL PROCESS STARTED PRIOR TO RECEIPT Y OR N
SAMPLE(S) RECEIVED ON ICE Y OR N
BOTTLES RECEIVED IN GOOD CONDITION Y OR N
BOTTLES FILLED WITH ADEQUATE VOLUME Y OR N
SAMPLES RECEIVED WITHIN HOLD TIME(S) Y OR N

PAGE _____ OF _____

NORTHWESTERN STEEL AND WIRE COMPANY
Sterling, Illinois

GROUND WATER FIELD SURVEY FORM

Federal I. D. ILD005263157
Ill Site 1950500007

Sample Point I.D. MW 116
Purge Date 2-6-01
Purge Time 1300
Sample Date 2-6-01
Sample Time 1340

Casing Vol. (gals) 35.19 5.6 x 3
Vol. Purged (gals) 16.17
Sample Method Waterra Pump
Seal No.

Elevation
Water Level 1283
GW Elevation

Total Well Depth 4802
Stick-Up
Sample Temp. (°C) 10.4

Weather Conditions Cloudy 35°F Wind N.W 5-10 mph
Sample Appearance No odor / turbid
Sampler Comments

Unable To Obtain Sample (X)
Sample Composited (X)

Reason
Procedure/Proportions

pH	7.21	7.11	7.06	6.99
Sp. Cond (umhos)	750 10.1	700 10.1	700 10.1	710 10.4

Lab

Comments

I certify that sampling procedures were in accordance with EPA and corporate protocols.

Sampler Name (print) J M Brown Signature J M Brown

CHAIN OF CUSTODY RECORD

2231 WEST ALTORFER DRIVE
PEORIA, IL 61615

PHONE # 309-692-9688
FAX # 309-692-9689

ALL SHADED AREAS MUST BE COMPLETED BY CLIENT (PLEASE PRINT)

1 CLIENT	PROJECT NUMBER	P.O. NUMBER	MEANS SHIPPED	3 ANALYSIS REQUESTED	4 (FOR LAB USE ONLY)
NWSD Pre RCRA					LOGIN #
ADDRESS	PHONE NUMBER	FAX NUMBER	DATE SHIPPED		LOGGED BY:
CITY STATE ZIP	SAMPLER (PLEASE PRINT) Dm Brewer		MATRIX TYPES: WW-WASTEWATER DW-DRINKING WATER GW-GROUND WATER WWSL-SLUDGE NAS-SOLID OTHER:		LAB PROJ. #
CONTACT PERSON	SAMPLER'S SIGNATURE Dm Brewer				TEMPLATE:
					PROJ. MGR.:

2 SAMPLE DESCRIPTION	DATE COLLECTED	TIME COLLECTED	SAMPLE TYPE GRAB	SAMPLE TYPE COMP	MATRIX TYPE	TOTAL # OF CONT	REMARKS
MW11C	2/6/00	1340			GW	3	Resamples

5 TURNAROUND TIME REQUESTED (PLEASE CIRCLE) NORMAL RUSH
(RUSH TAT IS SUBJECT TO PDC LABS APPROVAL AND SURCHARGE)

RUSH RESULTS VIA (PLEASE CIRCLE) FAX PHONE

FAX # IF DIFFERENT FROM ABOVE: PHONE # IF DIFFERENT FROM ABOVE:

6 *The sample temperature will be measured upon receipt at the lab. By initialing this area you request that the lab notify you, before proceeding with analysis, if the sample temperature is outside of the range of 0.1-6.0°C. By not initialing this area you allow the lab to proceed with analytical testing regardless of the sample temperature.* _____

7 RELINQUISHED BY: (SIGNATURE)	DATE / TIME	RECEIVED BY: (SIGNATURE)	DATE / TIME
RELINQUISHED BY: (SIGNATURE)	DATE / TIME	RECEIVED AT LAB BY: (SIGNATURE)	DATE / TIME

8 COMMENTS: (FOR LAB USE ONLY)

SAMPLE TEMPERATURE UPON RECEIPT _____ °C
CHILL PROCESS STARTED PRIOR TO RECEIPT Y OR N
SAMPLE(S) RECEIVED ON ICE Y OR N
BOTTLES RECEIVED IN GOOD CONDITION Y OR N
BOTTLES FILLED WITH ADEQUATE VOLUME Y OR N
SAMPLES RECEIVED WITHIN HOLD TIME(S) Y OR N

NORTHWESTERN
STEEL AND WIRE COMPANY

October 3, 2000

Illinois Environmental Protection Agency
Bureau of Land
Planning and Reporting Section # 24
1021 North Grand Avenue East
P. O. Box 19276
Springfield, IL 62794-9276

RE: Northwestern Steel and Wire Co.
ILD 005 263 157
RCRA Part B Permit # B – 33R

Dear Sirs:

Northwestern Steel and Wire Company (NWSW) hereby submits the semi-annual progress report to IEPA for the Corrective Measures Implementation (CMI) for NWSW's pre-RCRA landfill under the renewed RCRA permit # B-33R. This progress report covers the period from March 22, 2000 through September 22, 2000. The preparation of the CMI was required by the Part B permit modification issued by the United States Environmental Protection Agency on March 22, 1993. Previous progress reports were submitted only to USEPA. With the renewal of NWSW's Part B permit, this and future progress reports are being sent to IEPA and copied to USEPA.

Please contact me at extension 2451 if you have any questions regarding this submission.

Very truly yours,

David E. Long
Environmental Manager

Enclosures

cc. Mr. Gale Hruska, USEPA Region V

CERTIFIED MAIL -- RETURN RECEIPT REQUESTED
7099 3220 0010 5949 8622

121 Wallace Street • PO Box 618 • Sterling, Illinois 61081-0618 • USA
Phone (815) 625-2500

Northwestern Steel and Wire Company

Pre-RCRA Landfill
Corrective Measures Implementation
Semi-Annual Progress Report

March 22, 2000 through September 22, 2000

October 3, 2000

CONTENTS

1.0 INTRODUCTION

This semi-annual progress report the is the third progress report for the renewed RCRA Part B permit for Northwestern Steel and Wire Company (NWSW), Sterling, Illinois. This report documents the Corrective Measures Implementation (CMI) being conducted on the pre-RCRA landfill located at the NWSW facility. The report covers the period of March 22, 2000 through September 22, 2000. The CMI is being conducted in accordance with the approved CMI operation of the corrective measures selected to protect human health and the environment. The CMI work plan contains the procedures necessary to monitor the performance of the corrective measures implemented at the pre-RCRA landfill.

1.1 History of the Pre-RCRA Landfill

The landfill is located approximately 500 feet north of the Rock River (Figure 1) and covers approximately 13.5 acres and is approximately eight (8) to ten (10) feet deep. Solid waste was disposed in the pre-RCRA landfill beginning in 1974. The waste disposed in the pre-RCRA landfill consisted of slag, brick, construction debris, and two sludges generated by on-site pollution control systems. The pre-RCRA landfill was closed in 1980 and a new RCRA landfill opened to receive the two sludges only. This new landfill received a Part B permit for the disposal of these two sludges on November 4, 1987. The Part B permit was subsequently renewed for ten years. The new permit was issued on March 10, 1999 with an effective date of April 14, 1999.

One condition of the initial RCRA landfill permit required a RCRA Facility Investigation (RFI) of the pre-RCRA landfill to determine if any releases from the landfill had occurred. The RFI was conducted in phases and determined that trichloroethylene (TCE), cis 1,2-dichloroethylene (DCE), and vinyl chloride (VC) were present in the groundwater beneath and downgradient from the landfill at elevated concentrations. Based on the findings of the RFI, the United States Environmental Protection Agency (USEPA) required that NWSW conduct a Corrective Measures Study (CMS) to

determine the best corrective measure alternative to achieve an acceptable level of risk within the exposed population. The CMS consisted of three distinct tasks: 1) additional field tests, 2) a risk assessment, and 3) an evaluation of potential corrective measures and recommendation of the alternative(s) that would result in an acceptable risk to human health.

1.2 Description of the Selected CMI Remedy

The various remediation technologies were evaluated as to their potential applicability to the pre-RCRA Landfill situation. This evaluation included no action, limited action, source control, groundwater remediation, and a combination of source control and groundwater remediation. The risk assessment showed that the present situation results in an acceptable level of risk to human health and the environment. Therefore the no action and limited action alternatives are acceptable means of complying with the goals of the CMS. Both result in the protection of human health. The limited action alternative, which is incorporated in the Part B permit modification effective March 22, 1993, offers the additional benefit of on-going monitoring which will provide for the detection of changes in concentrations of the compounds of concern (TCE, DCE and VC). The renewed permit removed the testing requirement for TCE, since TCE has not been detected in any of the monitoring wells for over eight years.

2.0 CMI OPERATIONS

The corrective measure design for the pre-RCRA landfill consists of 1) a system to prevent unauthorized disturbance of the soil and fill in the pre-RCRA landfill, and 2) a system of continued groundwater monitoring until the landfill meets the cleanup objectives contained in the Part B permit. These corrective measures, which have not been altered since the last semi-annual progress report, are described below.

2.1 Prevention of Unauthorized Disturbance

Unauthorized disturbance of the soil and fill in the pre-RCRA landfill are prevented by NWSW's existing facility security system. NWSW has a facility security system in place to prevent access by unauthorized personnel to the pre-RCRA landfill. NWSW employs 14 full-time guards plus 4 guard sergeants. One sergeant supervises each eight-hour shift. The sergeant is responsible for conducting two complete inspections of the entire plant perimeter each shift to assure unauthorized personnel are not present. The pre-RCRA landfill area is included in these inspections.

A security fence with no trespassing signs posted at various places along the fence surrounds the facility site occupied by NWSW. Access to the facility is gained through secured gates; therefore preventing unauthorized personnel from entering the facility. The main access gate to the facility is equipped with a guardhouse, which is occupied at all times. A gate located on the western edge of the facility, adjacent to the non-hazardous waste landfill, remains closed with access available to authorized personnel only. Additional signs have been posted around the pre-RCRA landfill as needed.

2.2 Groundwater Sampling Procedures

The groundwater monitoring wells around the pre-RCRA landfill are shown in Figure 2. The renewed Part B permit has identified the monitoring wells with new letter/number designations as follows:

Previous ID number	New Designation
MW-1	G101
MW-2	G102
MW-3	G103
MW-4	G104
MW-5	G105
MW-6R(replacement well)	R106
MW-7	G107
MW-8	G108

MW-9	G109
MW-10	G110
MW-11	G111
MW-12	G112
MW-13	G113
MW-14	G114
MW-15	G115
MW-16	G116
MW-17	G117
MW-18	G118

The renewed RCRA permit requires that monitoring wells G103, G104, R105, G111, G116 and G117 be sampled semi-annually in April-May and October-November, and that monitoring wells G102, G106, G108, G112, G115 and G 118 be sampled annually in April-May. Monitoring wells G103-4, R106, G111 and G116-7 delineate a Groundwater Management Zone (GMZ) at the site.

The first year of required quarterly sampling was completed with the May 10, 1994 sampling event. NWSW is presently in a semi-annual monitoring program.
On May 16-17, 2000 twelve monitoring wells were sampled, as is the annual requirement. The results of this sampling are being submitted with this progress report.

According to Mrs. E. Kay Ingles of the Daily Analytical Laboratory (now PDC Laboratories), the monitoring wells were sampled according to the following procedures.

Static water levels and well depth were measured in each well prior to sampling. Water levels were measured three consecutive times to the nearest 0.01 foot using a steel tape or electrical water level sensor, and recorded in the field notebook. Prior to collecting groundwater samples for chemical analysis, water standing in the well casing and filter pack was purged so that the sample would be obtained from water representative of

groundwater in the aquifer. A minimum of three well casing volumes of water was removed using a bailer or an inertial pump, whichever was appropriate for the depth of the well. Purged water was monitored for pH and specific conductance. Purging was considered complete when a minimum of three well casing volumes had been purged and the pH and specific conductance parameters had stabilized. Purged groundwater was temporarily stored in dedicated plastic containers and pumped back into each monitoring well after completion of each sampling event.

Groundwater samples from each well were collected using a clean Teflon® bailer. Groundwater samples were carefully poured from the sampling bailer into pre-cleaned, laboratory-supplied glass VOA vials with Teflon® septum caps. The VOA vials were completely filled to eliminate air bubbles. Each groundwater sample was sealed and labeled using labels provided by the analytical laboratory. The sample identification for each sample was as follows:

- Site Identification (NWSW for Northwestern Steel and Wire)
- Monitoring Well Number (G1XX)
- Ground water sample number (GW1) increasing sequentially.

An example groundwater sample identification number is NWSW-G110-GW2, which indicates that this sample is the second collected at the Northwestern Steel and Wire site from monitoring well G110. Samples were placed on ice in a cooler for sample preservation. Water temperature, pH, Eh, and specific conductance measurements were measured and recorded in the field notebook at the time of sampling. Field measurement equipment were calibrated daily according to the manufacturer's recommendations.

As part of the quality assurance program, one duplicate groundwater sample and one field equipment blank per sampling event was collected and submitted to the laboratory for contaminant analysis. In addition, a trip blank was submitted with each sample shipment and analyzed for VOCs. Samples were presented as described above and shipped to the analytical laboratory in a timely manner. Chain-of-custody forms for the samples were included in each shipment.

Groundwater monitoring and sampling equipment was decontaminated prior to use at each monitoring well using procedures discussed in Section 9.12 of the CMI to prevent the possibility of cross-contamination between monitoring wells. Care was taken to prevent the decontaminated well purging and sampling equipment from coming into contact with the ground surface.

When samples were received at the laboratory, sample containers were inspected for integrity, proper labeling, proper preservation, and properly completed chain of custody form(s). The samples were logged in by the laboratory and a unique laboratory sample number assigned to each sample. Laboratory sample numbers were entered into the laboratory's master logbook and used on sample laboratory sheets. Other pertinent information such as the date and time of sample receipt was also recorded. Samples were stored in secured refrigerators at the laboratory.

Groundwater samples were analyzed for VC and DCE. Detailed information on the analytical procedures such as potential interferences, precision and accuracy of the methodology, and method detection limits are identified in Test Methods for Evaluating Solid Waste, SW-846 (EPA, 1986). For each groundwater sampling episode, laboratory quality assurance/quality control (QA/QC) consisted of analyzing field blanks, field duplicates, and standard laboratory QA/QC samples. A complete laboratory analytical report from PDC Analytical Laboratories is provided as Appendix A.

2.3 Groundwater Sampling Results

During the May 16-17 sampling event, monitoring wells G102-5, R106, G108, G111-12 and G115-18 were sampled and analyzed for VC and DCE. Tables 1 and 2 summarize the results of the groundwater sampling conducted for the CMI Program.

The results presented in Table 1 show that for the twelve wells sampled on May 16-17, seven show concentrations below the VC detection level, four wells (G103, G104, G116 and G117) have lower VC concentrations than the last time these wells were sampled. The VC concentration at well G105 went up slightly. For this sampling event, the VC concentration in G104 was within the calibration range of the laboratory instrumentation. Consequently, no sample dilution prior to analysis was necessary as had been required once before. The VC concentrations did not exceed the maximum allowable permit levels for any of the wells.

Table 2 provides the analytical results for DCE during the most recent CMI Sampling. The May 16-17 results for the 12 monitoring wells sampled shows DCE levels below detection limit in five wells, an increase in DCE concentration from 7.4 and <5 to 15 and 5 ppm in wells G111 and G115 respectively, and a decrease in DCE concentration in five wells from previous sampling. The DCE concentration in G117 did not exceed the maximum allowable permit level of 97ug/L.

3.0 PROBLEMS ENCOUNTERED

No problems were encountered during the six months that are the subject of this report for the implementation of the CMI plan. Some heavy equipment activity occurred in the vicinity of the wells. Supervisors of heavy equipment in the area of the wells have been again warned of their presence.

4.0 PERSONNEL CHANGES

The project management organization remains the same as initially described in the CMI Work Plan including changes described in prior progress reports.

5.0 ACTIVITIES FOR THE NEXT REPORTING PERIOD

5.1 Description of Activities

The planned activities for the next reporting period include the continued operation and maintenance of the corrective measures implementation program as described in the CMI work plan. This will include periodic landfill inspections and maintenance. The groundwater sampling program and monitoring of the performance of the corrective measures implementation will also continue on a semi-annual basis in accordance with the CMI work plan.

5.2 Schedule

A schedule for future groundwater sampling and reporting requirements is provided in Figure 3.

6.0 TRIGGERING OF CONTINGENT CORRECTIVE MEASURES

Section III(G)(1)(c) of the permit establishes maximum allowable DCE and VC concentrations in monitoring wells G103-5, G111 and G116-17. If an individual maximum concentration is exceeded, then the contingent corrective measures may need to be implemented. As discussed in Section 2.3, Groundwater Sampling Results, none of the individual triggering concentrations for VC or DCE were exceeded. There has been no evidence of unauthorized disturbance of the pre-RCRA landfill soils or fill. Therefore, no contingent corrective measures have been triggered.

7.0 COMMUNITY RELATIONS ACTIVITIES

The Community Relations Plan (CRP) was prepared to guide community relations activities during the implementation of corrective measures at NWSW's pre-RCRA Landfill. The purposes of the CRP are to make available to the local community, information concerning the corrective measures actions, and to facilitate communication between NWSW and the community. During this period of the CMI, no citizens or

interested parties have contacted NWSW concerning the CMI operations at the pre-RCRA Landfill.

7.1 Status of the Community Relations Objectives

This section presents the status of the community relations objectives used during the implementation of the corrective measures to ensure that the community is included in the process. The following techniques were organized according to the objectives of the community relations program:

1. Objective: Provide Community with Information.

   Technique: Establish Information Repository

   Purpose: To provide site-specific information to the community.

   Actions Taken: The information repository was established at the following location:

   Northwestern Steel and Wire Company
   121 Wallace Street
   P.O. Box 618
   Sterling, IL 61081-0618
   Telephone: (815) 625-2500

2. Objective: Respond to Community Concerns and Needs that Arise During the Corrective Measures Implementation.

   Technique: Monitor Community Concerns.

   Purpose: To continually assess and address community concerns throughout the implementation of the corrective measures.

   Action Taken: NWSW has identified David E. Long, Environmental Manager, as the contact person to whom citizens or groups can direct their written concerns and questions. NWSW has provided a telephone number for monitoring community concerns. The representative from NWSW is accessible by telephone 5 days a week, Monday through Friday, from 8:00 am to 5:00 p.m. at (815) 625-2500 ext. 2451.

3. Objective: Provide for Effective Management of the Community Relations

Program.

Technique: Management of Community Relations Program.

Purpose: To address community concerns that emerge during the implementation of the corrective measures.

Action Taken: No community concerns have emerged during this period of the CMI. No comments or questions have been received during the period covered by this progress report.

word/long/anrpt2

Table 1. Northwestern Steel and Wire Company Pre-Rcra Landfill
Groundwater Sampling

Vinyl Chloride Analytical Results, ug/L

Monitoring Well	G101	G102	G103	G104	G105	G106	G107	G108	G109	G110	G111	G112	G113	G114	G115	G116	G117	G118
Permit Max.			240	277	44						8					14	151	
5/13-14/99		<2	75	200	20	<2		<2			<2	<2			<2	<2	78	<2
11/11/99			140	87	13						12					28	89	
5/16-17/00		<5	52	36	19	<5		<5			<5	<5			<5	11	62	<5

* Permit Maximum is the maximum concentration allowed by Section III (G)(1)(c) of the permit.

** Compound present below reporting limit

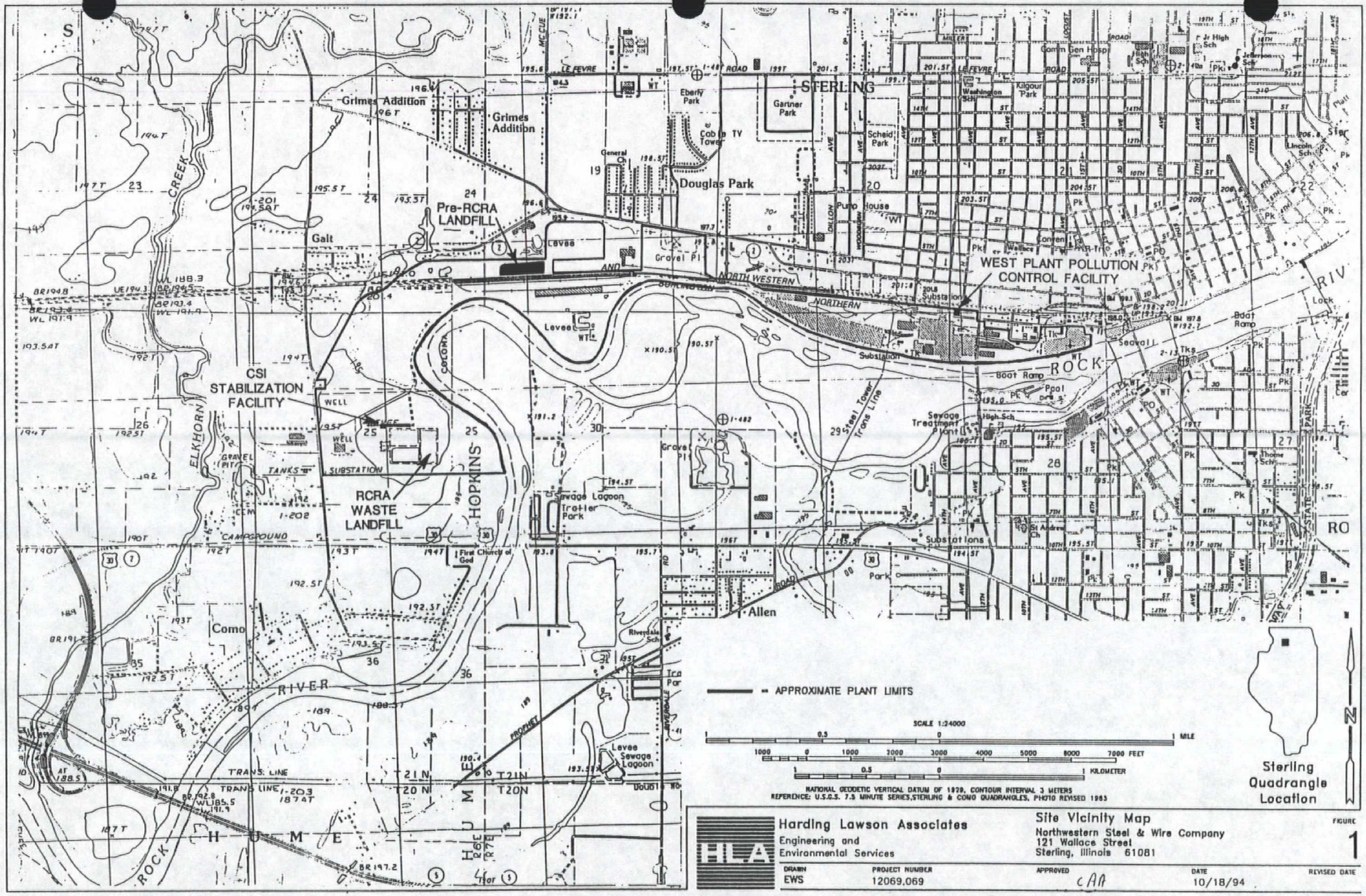
Table 2. Northwestern Steel and Wire Company Pre-Rcra Landfill
Groundwater Sampling

cis-1, 2 DCE Analytical Results, ug/L

Monitoring Well	G101	G102	G103	G104	G105	G106	G107	G108	G109	G110	G111	G112	G113	G114	G115	G116	G117	G118
Permit Max.																	97	
5/13-14/99		<5	16	27	19	<5		<5			20	<5			<5	33	24	5.6
11/11/99			17	11	25						7.4					65	38	
5/16-17/00		<2	5	5	19	<2		<2			15	<2			5	28	12	<2

* Permit Maximum is the maximum concentration allowed by Section III (G)(1)(c) of the permit.

** Compound present below reporting limit

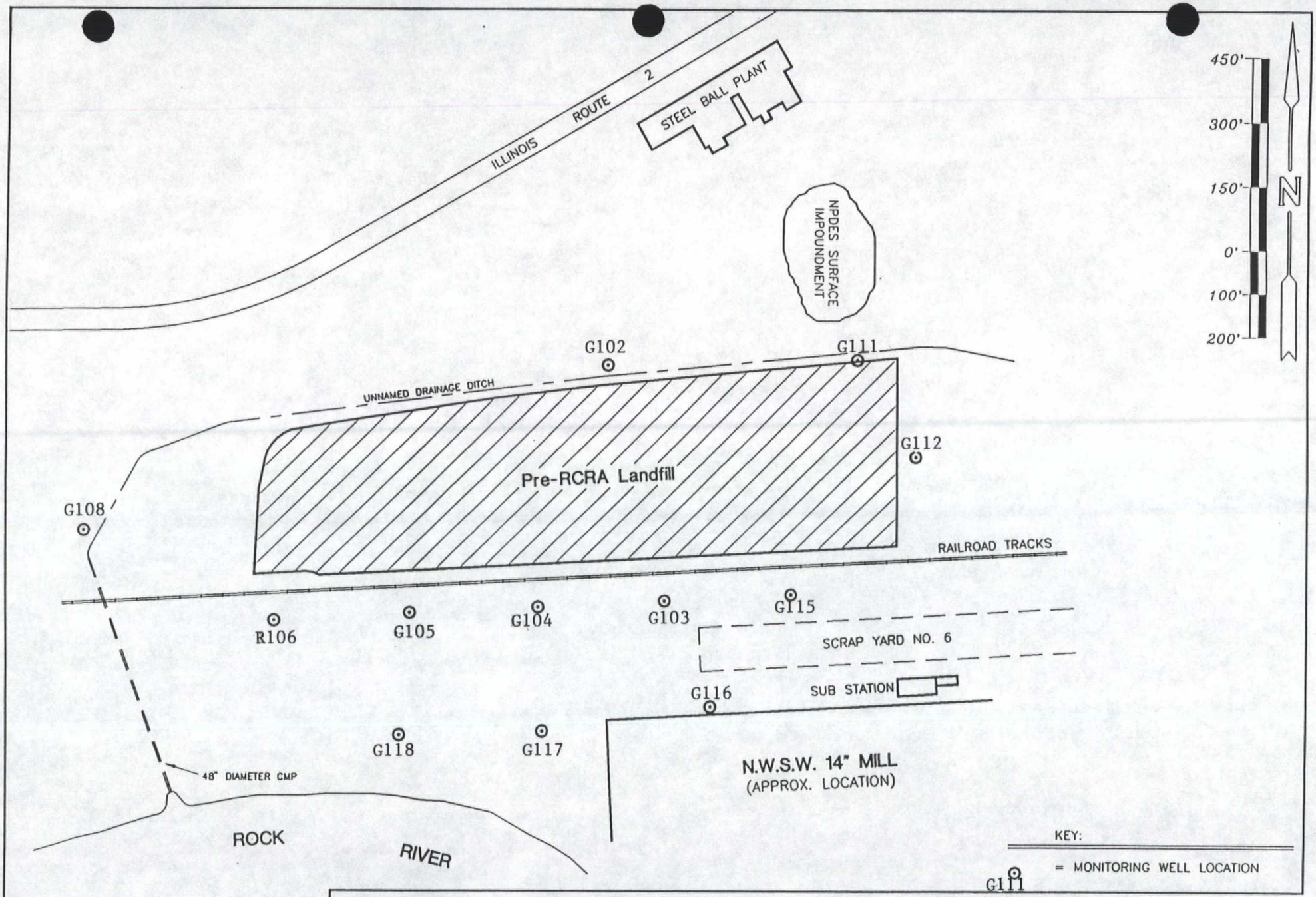


Harding Lawson Associates
Engineering and Environmental Services

Site Vicinity Map
Northwestern Steel & Wire Company
121 Wallace Street
Sterling, Illinois 61081

FIGURE 1

DRAWN	PROJECT NUMBER	APPROVED	DATE	REVISED DATE
EWS	12069.069	CAA	10/18/94	



Harding Lawson Associates
Engineering and
Environmental Services

Monitoring Well Location Map
Pre-RCRA Landfill
Northwestern Steel & Wire Company
Sterling, Illinois 61081

FIGURE 2

DRAWN	PROJECT NUMBER	APPROVED	DATE	REVISED DATE
EWS	12069,11.1		09/16/93	3/10/00

FIGURE 3

SCHEDULE FOR FUTURE CMI ACTIVITIES

GROUNDWATER SAMPLING SEMI-ANNUAL, 6 WELLS	**MID-NOVEMBER, 2000**
CMI PROGRESS REPORT	**APRIL, 2001**
GROUNDWATER SAMPLING, ANNUAL, 12 WELLS	**MID-MAY, 2001**
CMI PROGRESS REPORT	**OCTOBER, 2001**

File

NORTHWESTERN
STEEL AND WIRE COMPANY

July 17, 2000

Illinois Environmental Protection Agency
Bureau of Land
Planning and Reporting Section # 24
1021 North Grand Avenue East
P. O. Box 19276
Springfield, IL 62794-9276

RE: Northwestern Steel and Wire Co.
ILD 005 263 157
RCRA Part B Permit # B – 33R

Dear Sirs:

Northwestern Steel and Wire Company (NWSW) hereby submits the semi-annual progress report to IEPA for the Corrective Measures Implementation (CMI) for NWSW's pre-RCRA landfill under the renewed RCRA permit # B-33R. This progress report covers the period from September 22, 1999 through March 22, 2000. The preparation of the CMI was required by the Part B permit modification issued by the United States Environmental Protection Agency on March 22, 1993. Previous progress reports were submitted only to USEPA. With the renewal of NWSW's Part B permit, this and future progress reports are being sent to IEPA and copied to USEPA.

Please contact me at extension 2451 if you have any questions regarding this submission.

Very truly yours,

David E. Long
Environmental Manager

Enclosures

cc. Mr. Gale Hruska, USEPA Region V

CERTIFIED MAIL -- RETURN RECEIPT REQUESTED
7099 3220 0010 5983 8336

121 Wallace Street ● Sterling, Illinois 61081 ● USA
Phone (815)625-2500

Northwestern Steel and Wire Company
Corrective Measures Implementation
Semi-Annual Progress Report
September 22, 1999 through March 22, 2000

July 17, 2000

CONTENTS

1.0 INTRODUCTION

This semi-annual progress report (the Report) is the second progress report for the renewed RCRA Part B permit for Northwestern Steel and Wire Company (NWSW), Sterling, Illinois. This report documents the Corrective Measures Implementation (CMI) being conducted on the pre-RCRA landfill located at the NWSW facility. The Report covers the period September 22, 1999 through March 22, 2000. The CMI is being conducted in accordance with the approved CMI operation of the corrective measures selected to protect human health and the environment. The CMI work plan contains the procedures necessary to monitor the performance of the corrective measures implemented at the pre-RCRA landfill.

1.1 History of the Pre-RCRA Landfill

The landfill is located approximately 500 feet north of the Rock River (Figure 1) and covers approximately 13.5 acres and is approximately eight to ten feet deep. Solid waste was disposed in the pre-RCRA landfill beginning in 1974. The waste disposed in the pre-RCRA landfill consisted of slag, brick, construction debris, and two sludges generated by on-site pollution control systems. The pre-RCRA landfill was closed in 1980 and a new RCRA landfill opened to receive the two sludges only. This new landfill received a Part B permit for the disposal of these two sludges on November 4, 1987. The permit was subsequently renewed for ten years. The new permit was issued on March 10, 1999, with an effective date of April 14, 1999.

One condition of the RCRA landfill permit required a RCRA Facility Investigation (RFI) of the pre-RCRA landfill to determine if any releases from the landfill had occurred. The RFI was conducted in phases and determined that trichloroethylene (TCE), cis 1,2-dichloroethylene (DCE), and vinyl chloride (VC) were present in the groundwater beneath and downgradient from the landfill at elevated concentrations. Based on the findings of the RFI, the United States Environmental Protection Agency (U.S. EPA) required that NWSW conduct a Corrective Measures Study (CMS) to determine the best

corrective measure alternative to achieve an acceptable level of risk within the exposed population. The CMS consisted of three distinct tasks: 1) additional field tests, 2) a risk assessment, and 3) an evaluation of potential corrective measures and recommendation of the alternative(s) that would result in an acceptable risk to human health.

1.2 Description of the Selected CMI Remedy

The various remediation technologies were evaluated as to their potential applicability to the pre-RCRA Landfill situation. This evaluation included no action, limited action, source control, groundwater remediation, and a combination of source control and groundwater remediation. The risk assessment showed that the present situation results in an acceptable level of risk to human health and the environment. Therefore the no action and limited action alternatives are acceptable means of complying with the goals of the CMS. Both result in the protection of human health. The limited action alternative, which is incorporated in the Part B permit modification effective March 22, 1993, offers the additional benefit of on-going monitoring which will provide for the detection of changes in concentrations of the compounds of concern (TCE, DCE and VC). The renewed permit removed the testing requirement for TCE, since TCE has not been detected in any of the monitoring wells in over eight years.

2.0 CMI OPERATIONS

The corrective measure design for the pre-RCRA landfill consists of 1) a system to prevent unauthorized disturbance of the soil and fill in the pre-RCRA landfill, and 2) a system of continued groundwater monitoring until the landfill meets the cleanup objectives contained in the Part B permit. These corrective measures, which have not been changed since the last semi-annual progress report, are described below.

2.1 Prevention of Unauthorized Disturbance

Unauthorized disturbance of the soil and fill in the pre-RCRA landfill are prevented by NWSW's existing facility security system. NWSW has a facility security system in place

to prevent access by unauthorized personnel to the pre-RCRA landfill. NWSW employs 14 full-time guards plus 4 guard sergeants and a security supervisor. One sergeant supervises each eight-hour shift. The sergeant is responsible for conducting two complete inspections of the entire plant perimeter each shift to assure unauthorized personnel are not present. The pre-RCRA landfill area is included in these inspections.

A security fence with No Trespassing signs posted at various places along the fence surrounds the facility site occupied by NWSW. Access to the facility is gained through secured gates, therefore preventing unauthorized personnel from entering the facility. The main access gate to the facility is equipped with a guardhouse that is occupied at all times. A gate located on the western edge of the facility, adjacent to the non-hazardous waste landfill, remains closed and locked with access available only to authorized personnel. Additional signs have been posted around the pre-RCRA landfill as needed.

2.2 Groundwater Sampling Procedures

The groundwater monitoring wells around the pre-RCRA landfill are shown in Figure 2. The renewed Part B permit has identified the monitoring wells with new letter/number designations as follows:

Previous ID number	New ID number
MW-1	G101
MW-2	G102
MW-3	G103
MW-4	G104
MW-5	G105
MW-6	G106
MW-7	G107
MW-8	G108
MW-9	G109
MW-10	G110
MW-11	G111

MW-12	G112
MW-13	G113
MW-14	G114
MW-15	G115
MW-16	G116
MW-17	G117
MW-18	G118

The renewed RCRA permit requires that monitoring wells G103, G104, G105, G111, G116 and G117 be sampled semi-annually in April-May and October-November, and that monitoring wells G102, G106, G108, G112, G115 and G118 be sampled annually in April-May. Monitoring wells G103-5, G111 and G116-7 delineate a Groundwater Management Zone (GMZ) at the site.

On November 11, 1999, six monitoring wells were sampled, as is the semi-annual requirement. The results of this sampling are being submitted with this progress report. The first year of required quarterly sampling was completed with the May 10, 1994 sampling event. NWSW has now moved into the semi-annual monitoring program.

According to Mrs. E. Kay Ingles of the Daily Analytical Laboratory (now PDC Laboratories, Inc.) the monitoring well sampling procedure is as follows.

Static water levels and well depth were measured in each well prior to sampling. Water levels were measured three consecutive times to the nearest 0.01 foot using a steel tape or electrical water level sensor, and recorded in the field notebook. Prior to collecting groundwater samples for chemical analysis, water standing in the well casing and filter pack was purged so that the sample would be obtained from water representative of groundwater in the aquifer. A minimum of three well casing volumes of water was removed using a bailer or an inertial pump; whichever was appropriate for the depth of the well. Purged water was monitored for pH and specific conductance. Purging was considered complete when a minimum of three well casing volumes had been purged and

the pH and specific conductance parameters had stabilized. Purged groundwater was temporarily stored in dedicated plastic containers and pumped back into each monitoring well after completion of each sampling event.

Groundwater samples from each well were collected using a clean Teflon® bailer. Groundwater samples were carefully poured from the sampling bailer into pre-cleaned, laboratory-supplied glass VOA vials with Teflon® septum caps. The VOA vials were completely filled to eliminate air bubbles. Each groundwater sample was sealed and labeled using labels provided by the analytical laboratory. The sample identification for each sample was as follows:

- Site Identification (NWSW for Northwestern Steel and Wire Co.)
- Monitoring Well Number (G1XX)
- Ground water sample number (GW1) increasing sequentially.

A possible groundwater sample identification number is NWSW-G110-GW2, which indicates that this sample is the second collected at the Northwestern Steel and Wire site from monitoring well G110. Samples were placed on ice in a cooler for sample preservation. Water temperature, pH, Eh, and specific conductance measurements were measured and recorded in the field notebook at the time of sampling. Field measurement equipment were calibrated daily according to the manufacturer's recommendations.

As part of the quality assurance program, one duplicate groundwater sample and one field equipment blank per sampling event was collected and submitted to the laboratory for contaminant analysis. In addition, a trip blank was submitted with each sample shipment and analyzed for VOCs. Samples were collected as described above and were shipped to the analytical laboratory in a timely manner. Chain-of-custody forms for the samples were included in each shipment.

Groundwater monitoring and sampling equipment was decontaminated prior to use at each monitoring well using procedures discussed in Section 9.12 of the CMI to prevent the possibility of cross-contamination between monitoring wells. Care was taken to

prevent the decontaminated well purging and sampling equipment from coming into contact with the ground surface.

When samples were received at the laboratory, sample containers were inspected for integrity, proper labeling, proper preservation, and properly completed chain of custody form(s). The samples were logged in by the laboratory and a unique laboratory sample number assigned to each sample. Laboratory sample numbers were entered into the laboratory's master logbook and used on sample laboratory sheets. Other pertinent information such as the date and time of sample receipt was also recorded. Samples were stored in secured refrigerators at the laboratory.

Groundwater samples were analyzed for VC and DCE. Detailed information on the analytical procedures such as potential interferences, precision and accuracy of the methodology, and method detection limits are identified in Test Methods for Evaluating Solid Waste, SW-846 (EPA, 1986). For each groundwater sampling episode, laboratory quality assurance/quality control (QA/QC) consisted of analyzing field blanks, field duplicates, and standard laboratory QA/QC samples. Analytical analyses from PDC Laboratories are provided as Appendix A.

2.3 Groundwater Sampling Results

During the November 11th sampling event, monitoring wells G103-5, G111, G116 and G117 were sampled and analyzed for VC and DCE. Tables 1 and 2 summarize the results of the groundwater sampling historical analysis conducted for the CMI Program under the latest RCRA permit.

The results presented in Table 1 show that for the 6 wells sampled, 4 wells (G103, G111, G116 and G 117) show an increase in VC concentration, and 2 wells (G104 and G 105) show a decrease in VC concentration from the levels recorded on May 13-14, 1999, which was the last time these wells were sampled. For this sampling event, the VC

concentration in MW-4 was within the calibration range of the laboratory instrumentation. Consequently, no sample dilution prior to analysis was necessary.

During a check of the sampling results for this report, the pre-RCRA results from the November 11th sampling were found to have been incorrectly entered on the IEPA Chemical Analysis Forms. Corrected forms were prepared and were sent to IEPA. After these changes were made, it was determined that the VC concentrations exceeded the maximum allowable permit levels for the two wells with the lowest VC permit limits. Well G111 had a concentration of 12 ug/L versus a permit limit of 8 ug/L, and G116 had a concentration of 28 ug/L versus a permit limit of 14 ug/L. These exceedances were noticed on July 3rd, 2000. PDC Laboratories was notified and the data was rechecked. In the meantime, the annual pre-RCRA sampling had been conducted in May and those results were compared with the November results. The test results from the May sampling event show lower overall concentrations of both VC and DCE, and all VC concentrations were below permit limits.

Table 2 provides the analytical results for DCE during the previous sampling period and the November 1999 and May 2000 sampling periods. The November 11, 1999 results for the 6 monitoring wells sampled shows an increase in DCE concentration in 4 wells (G103, G105, G116 and G117), and a decrease in DCE concentration in two wells (G104 and G111). The DCE concentration for well G117 did not exceed the maximum allowable permit level of 97 ug/L for any of the three sampling events.

3.0 PROBLEMS ENCOUNTERED

The only problem encountered during the six months that are the subject of this report for the implementation of the CMI plan was the VC concentrations in wells G111 and G116. IEPA Springfield and the regional Rockford office were notified of the VC results. Both offices felt that the retesting that would be necessary was already done with the May sampling, and, since concentrations were now below permit limits, no further steps were

required. The present position is to wait to see what results come from the November 2000 testing.

4.0 PERSONNEL CHANGES

The project management organization remains the same as initially described in the CMI Work Plan including changes described in prior progress reports.

5.0 ACTIVITIES FOR THE NEXT REPORTING PERIOD

5.1 Description of Activities

The planned activities for the next reporting period include the continued operation and maintenance of the corrective measures implementation program as described in the CMI work plan. This will include periodic landfill inspections and maintenance. The groundwater sampling program and monitoring of the performance of the corrective measures implementation will also continue in accordance with the CMI work plan.

5.2 Schedule

A schedule for future groundwater sampling and reporting requirements is provided in Figure 3.

6.0 TRIGGERING OF CONTINGENT CORRECTIVE MEASURES

Section III(G)(1)(c) of the permit establishes maximum allowable DCE and VC concentrations in monitoring wells G103-5, G111 and G116-7. If an individual maximum concentration is exceeded, then the contingent corrective measures must be implemented. As discussed in Section 2.3, Results of Groundwater Data, the individual triggering concentrations for VC were exceeded. However, since subsequent sampling shows a return to lower VC values, no additional steps will be taken until after the November 2000 sampling results are obtained. There has been no evidence of

unauthorized disturbance of the pre-RCRA landfill soils or fill. Therefore, no contingent corrective measures have been triggered.

7.0 COMMUNITY RELATIONS ACTIVITIES

The Community Relations Plan (CRP) was prepared to guide community relation activities during the implementation of corrective measures at NWSW's pre-RCRA landfill. The purposes of the CRP are to make available to the local community, information concerning the corrective measures actions, and to facilitate communication between NWSW and the community. During this period of the CMI no citizens or interested parties have contacted NWSW concerning the CMI operations at the pre-RCRA landfill.

7.1 Status of the Community Relations Objectives

This section presents the status of the community relations objectives used during the implementation of the corrective measures to ensure that the community is included in the process. The following techniques were organized according to the objectives of the community relations program:

1. Objective: Provide community with information.

   Technique: Establish information repository

   Purpose: To provide site-specific information to the community.

   Actions Taken: The information repository was established at the following location:
   Northwestern Steel and Wire Company
   121 Wallace Street, P.O. Box 618
   Sterling, IL 61081-0618
   Telephone: (815) 625-2500

2. Objective: Respond to community concerns and needs that arise during the Corrective Measures Implementation.

   Technique: Monitor community concerns.

Purpose: To continually assess and address community concerns throughout the implementation of the corrective measures.

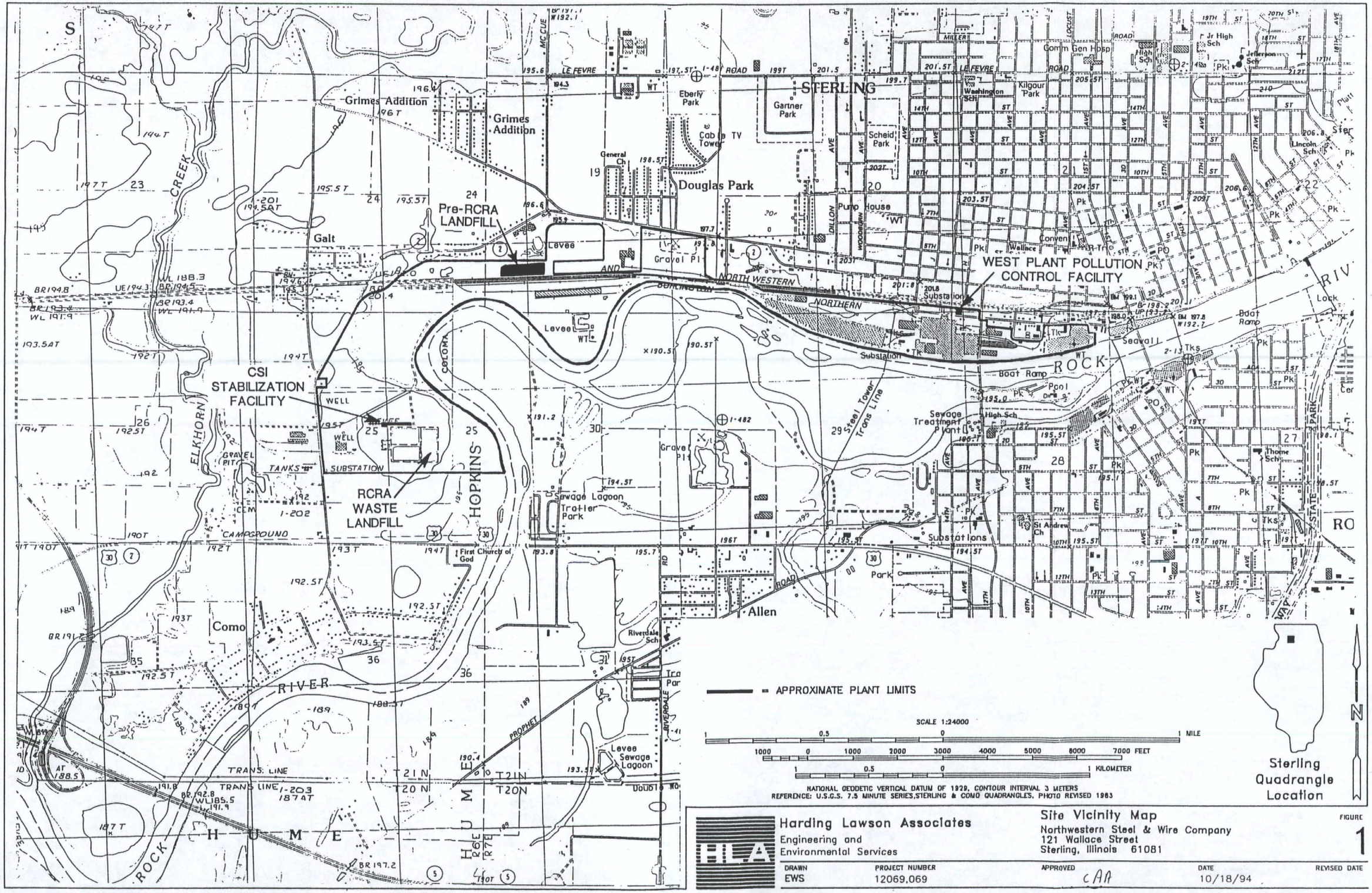
Action Taken: NWSW has identified David Long, Environmental Manager, as the contact person to whom citizens or groups can direct their written concerns and questions. NWSW has provided a telephone number for monitoring community concerns. The representative from NWSW is accessible by telephone five days a week, Monday through Friday, from 8:00 a.m. to 5:00 p.m. at (815) 625-2500 ext. 2451.

3. Objective: Provide for effective management of the community relations program.

Technique: Management of community relations program.

Purpose: To address community concerns that emerge as a result of implementation of the corrective measures.

Action Taken: No community concerns have emerged during this period of the CMI. No comments or questions have been received during the period covered by this progress report.

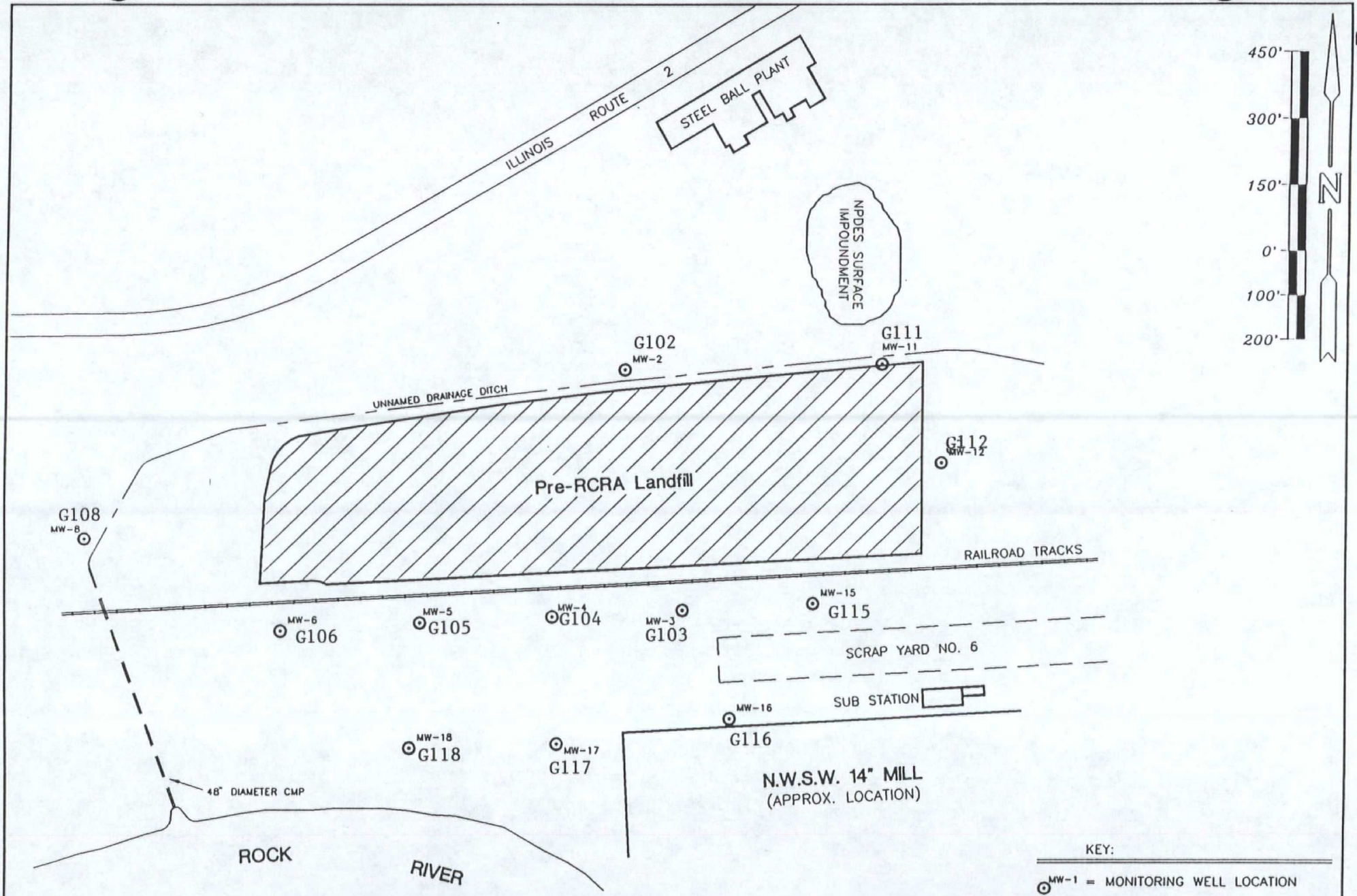


Harding Lawson Associates
Engineering and
Environmental Services

Site Vicinity Map
Northwestern Steel & Wire Company
121 Wallace Street
Sterling, Illinois 61081

FIGURE 1

DRAWN	PROJECT NUMBER	APPROVED	DATE	REVISED DATE
EWS	12069,069	CAA	10/18/94	



Harding Lawson Associates
Engineering and
Environmental Services

Monitoring Well Location Map
Pre-RCRA Landfill
Northwestern Steel & Wire Company
Sterling, Illinois 61081

FIGURE 2

DRAWN	PROJECT NUMBER	APPROVED	DATE	REVISED DATE
EWS	12069.11.1		09/16/93	

Table 1. Northwestern Steel and Wire Company Pre-Rcra Landfill
Groundwater Sampling

Vinyl Chloride Analytical Results, ug/L

Monitoring Well	G101	G102	G103	G104	G105	G106	G107	G108	G109	G110	G111	G112	G113	G114	G115	G116	G117	G118
Permit Max.			**240**	**277**	**44**						**8**					**14**	**151**	
5/13-14/99		<2	75	200	20	<2		<2			<2	<2			<2	<2	78	<2
11/11/99			140	87	13						12					28	89	
5/16-17/00		<5	52	36	19	<5		<5			<5	<5			<5	11	62	<5

* Permit Maximum is the maximum concentration allowed by Section III (G)(1)(c) of the permit.

** Compound present below reporting limit

Table 2. Northwestern Steel and Wire Company Pre-Rcra Landfill
Groundwater Sampling

cis-1, 2 DCE Analytical Results, ug/L

Monitoring Well	G101	G102	G103	G104	G105	G106	G107	G108	G109	G110	G111	G112	G113	G114	G115	G116	G117	G118
Permit Max.																	97	
5/13-14/99		<5	16	27	19	<5		<5			20	<5			<5	33	24	5.6
11/11/99			17	11	25						7.4					65	38	
5/16-17/00		<2	5	5	19	<2		<2			15	<2			5	28	12	<2

* Permit Maximum is the maximum concentration allowed by Section III (G)(1)(c) of the permit.

** Compound present below reporting limit

FIGURE 3

SCHEDULE FOR FUTURE CMI ACTIVITIES

GROUNDWATER SAMPLING, SEMI-ANNUAL, 12 WELLS	**APRIL-MAY, 2000**
CMI PROGRESS REPORT	**SEPTEMBER-OCTOBER, 2000**
GROUNDWATER SAMPLING SEMI-ANNUAL, 6 WELLS	**OCTOBER-NOVEMBER, 2000**
CMI PROGRESS REPORT	**MARCH-APRIL, 2001**

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF LAND POLLUTION CONTROL
CHEMICAL ANALYSIS FORM

RECORD CODE: L P C S M 0 1 (1–7) TRANS CODE: A (8)

REPORT DUE DATE: 01 (36 M) / 15 (D) / 00 (Y 41)

FEDERAL ID NUMBER: _____

SITE INVENTORY NUMBER: 1 9 5 0 5 0 0 0 0 7 (9–18)

MONITOR POINT NUMBER (See instructions): G 1 0 3 (19 H, M, 58)

REGION: R CO.: Whiteside

DATE COLLECTED: 11 (23 M) / 11 (D) / 99 (Y 28)

FACILITY NAME: Northwestern Steel & Wire Company Pre-RCRA Landfill

FOR IEPA USE ONLY

LAB: _____ (29)

DATE RECEIVED: _____ (42 M) _____ (D) _____ (Y 47)

BACKGROUND SAMPLE (X): _____ (54) TIME COLLECTED (24 hr clock): 12 (55 H) : 40 (M 58)

UNABLE TO COLLECT SAMPLE (See instructions): _____ (59)

MONITOR POINT SAMPLED BY (See instructions): 3 (60) inertial pump (OTHER (Specify))

SAMPLE FIELD FILTERED-INORGANICS (X): _____ (61) ORGANICS(X): _____ (62)

SAMPLE APPEARANCE: (63–102)

COLLECTOR COMMENTS: (103–142)

LAB COMMENTS: (150–199)

RECORD CODE: L P C S M 0 2 (1–7) TRANS CODE: A (8) (COLUMNS 9-29 FROM ABOVE)

	FIELD MEASUREMENTS CONSTITUENT DESCRIPTION AND REQUIRED UNIT OF MEASURE	STORET NUMBER (30–34)	REMARKS See Instr. (35)	REPLICATE	< OR > (37)	VALUE (38–47)
Q	TEMP OF WATER (unfiltered F)	00011				54.
Q	SPEC COND (unfiltered umhos)	00094				820.
Q	pH (unfiltered units)	00400				7.24
Q	ELEV OF GW SURF (ft ref MSL)	71993				612.46
Q	DEPTH OF WATER (ft below LS)	72019				15.06
A	BTM WELL ELEV (ft ref MSL)	72020				.
Q	DEPTH TO WATER FM MEA PT (ft)	72109				15.06

This Agency is authorized to require this information under Illinois Revised Statutes, 1979, chapter 111 1/2, Section 1004 and 1021. Disclosure of this information is required. Failure to do so may result in a civil penalty up to $25,000 for each day the failure continues a fine up to $1,000 and imprisonment up to one year. This form has been approved by the Forms Management Center. *Only keypunch with Data in Column 35 of Columns 38-47.*

REVISED

CHEMICAL ANALYSIS FORM

IEPA/DLPC

RECORD CODE (1–7) L P C S M 0 2 | TRANS CODE (8) A

SITE INVENTORY NUMBER (9–18) 1 9 5 0 5 0 0 0 0 7 | MONITOR POINT NUMBER (19–22) G 1 0 3

CO. Whiteside

DATE COLLECTED (23–28) 1 1 / 1 1 / 9 9

Northwestern Steel & Wire Company Pre-RCRA Landfill
FACILITY NAME

LAB (29) 1

	LAB MEASUREMENTS CONSTITUENT DESCRIPTION AND REQUIRED UNIT OF MEASURE	STORET NUMBER (30–34)	Rem (35)	Rep (36)	< or > (37)	Value (38–47)
	cis-1,2-Dichloroethylene	7 7 0 9 3				1 7 .
	Vinyl Chloride	3 9 1 7 5				1 4 0 .

All analytical procedures must be performed in accordance with the methods contained in "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods," SW-846, 3rd Edition, September 1986 or equivalent methods approved by the Agency. Proper sample chain of custody control and quality assurance/quality control procedures must be maintained in accordance with the facility sampling and analysis plan.

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF LAND POLLUTION CONTROL
CHEMICAL ANALYSIS FORM

RECORD CODE: LPCSM01 (1–7) TRANS CODE: A (8)

REPORT DUE DATE: 01 (36 M) / 15 (D) / 00 (Y 41)

FEDERAL ID NUMBER: _____

SITE INVENTORY NUMBER: 1 9 5 0 5 0 0 0 0 7 (9–18)

MONITOR POINT NUMBER: G 1 0 4 (See instructions) (19 H, M 58)

REGION: R CO.: Whiteside

DATE COLLECTED: 11 (23 M) / 11 (D) / 99 (Y 28)

FACILITY NAME: Northwestern Steel & Wire Company Pre-RCRA Landfill

FOR IEPA USE ONLY

LAB: _____ (29)

DATE RECEIVED: _____ (42 M) _____ (D) _____ (Y 47)

BACKGROUND SAMPLE (X): _____ (54) TIME COLLECTED: 11 : 55 (24 hr clock) (55 H, M 58)

UNABLE TO COLLECT SAMPLE (See instructions): _____ (59)

MONITOR POINT SAMPLED BY (See instructions): 3 (60) inertial pump (OTHER (Specify))

SAMPLE FIELD FILTERED-INORGANICS (X): _____ (61) ORGANICS(X): _____ (62)

SAMPLE APPEARANCE: (63–102)

COLLECTOR COMMENTS: (103–142)

LAB COMMENTS: (150–199)

RECORD CODE: LPCSM02 (1–7) TRANS CODE: A (8) (COLUMNS 9-29 FROM ABOVE)

	FIELD MEASUREMENTS CONSTITUENT DESCRIPTION AND REQUIRED UNIT OF MEASURE	STORET NUMBER (30–34)	REMARKS See Instr. (35)	REPLICATE	< OR > (37)	VALUE (38–47)
Q	TEMP OF WATER (unfiltered F)	00011				54.
Q	SPEC COND (unfiltered umhos)	00094				880.
Q	pH (unfiltered units)	00400				7.29
Q	ELEV OF GW SURF (ft ref MSL)	71993				614.21
Q	DEPTH OF WATER (ft below LS)	72019				13.51
A	BTM WELL ELEV (ft ref MSL)	72020				.
Q	DEPTH TO WATER FM MEA PT (ft)	72109				13.51

This Agency is authorized to require this information under Illinois Revised Statutes, 1979, chapter 111 1/2, Section 1004 and 1021. Disclosure of this information is required. Failure to do so may result in a civil penalty up to $25,000 for each day the failure continues a fine up to $1,000 and imprisonment up to one year. This form has been approved by the Forms Management Center. *Only keypunch with Data in Column 35 of Columns 38-47.*

REVISED

CHEMICAL ANALYSIS FORM

IEPA/DLPC

RECORD CODE (1–7) LPCSM02 TRANS CODE (8) A

SITE INVENTORY NUMBER (9–18) 195050000 7 MONITOR POINT NUMBER (19–22) G104

CO. Whiteside

DATE COLLECTED (23–28) 11/11/99 (M/D/Y)

Northwestern Steel & Wire Company Pre-RCRA Landfill
FACILITY NAME

LAB (29) 1

	LAB MEASUREMENTS CONSTITUENT DESCRIPTION AND REQUIRED UNIT OF MEASURE	STORET NUMBER	Rem	Rep	< or >	Value
	cis-1,2-Dichloroethylene	77093 (30–34)	(35)	(36)	(37)	(38) 11. (47)
	Vinyl Chloride	39175				87.

All analytical procedures must be performed in accordance with the methods contained in "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods," SW-846, 3rd Edition, September 1986 or equivalent methods approved by the Agency. Proper sample chain of custody control and quality assurance/quality control procedures must be maintained in accordance with the facility sampling and analysis plan.

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF LAND POLLUTION CONTROL
CHEMICAL ANALYSIS FORM

RECORD CODE: L P C S M 0 1 (1–7) TRANS CODE: A (8)

REPORT DUE DATE: 01 (36 M) / 15 (D) / 00 (Y 41)

FEDERAL ID NUMBER: _____

SITE INVENTORY NUMBER: 1 9 5 0 5 0 0 0 0 7 (9–18)

MONITOR POINT NUMBER (See instructions): G 1 0 5 (19 H, M 58)

REGION: R CO.: Whiteside

DATE COLLECTED: 11 (23 M) / 11 (D) / 99 (Y 28)

FACILITY NAME: Northwestern Steel & Wire Company Pre-RCRA Landfill

FOR IEPA USE ONLY

LAB: _____ (29)

DATE RECEIVED: _____ (42 M, D, Y 47)

BACKGROUND SAMPLE (X): _____ (54) TIME COLLECTED (24 hr clock): 11 (55 H) : 20 (M 58)

UNABLE TO COLLECT SAMPLE (See instructions): _____ (59)

MONITOR POINT SAMPLED BY (See instructions): 3 (60) inertial pump (OTHER (Specify))

SAMPLE FIELD FILTERED-INORGANICS (X): _____ (61) ORGANICS(X): _____ (62)

SAMPLE APPEARANCE: (63–102)

COLLECTOR COMMENTS: (103–142)

LAB COMMENTS: (150–199)

RECORD CODE: L P C S M 0 2 (1–7) TRANS CODE: A (8) (COLUMNS 9-29 FROM ABOVE)

	FIELD MEASUREMENTS CONSTITUENT DESCRIPTION AND REQUIRED UNIT OF MEASURE	STORET NUMBER (30–34)	REMARKS See Instr. (35)	REPLICATE	< OR > (37)	VALUE (38–47)
Q	TEMP OF WATER (unfiltered F)	00011				52
Q	SPEC COND (unfiltered umhos)	00094				870.
Q	pH (unfiltered units)	00400				7.33
Q	ELEV OF GW SURF (ft ref MSL)	71993				614.50
Q	DEPTH OF WATER (ft below LS)	72019				12.52
A	BTM WELL ELEV (ft ref MSL)	72020				
Q	DEPTH TO WATER FM MEA PT (ft)	72109				12.52

This Agency is authorized to require this information under Illinois Revised Statutes, 1979, chapter 111 1/2, Section 1004 and 1021. Disclosure of this information is required. Failure to do so may result in a civil penalty up to $25,000 for each day the failure continues a fine up to $1,000 and imprisonment up to one year. This form has been approved by the Forms Management Center. *Only keypunch with Data in Column 35 of Columns 38-47.*

REVISED

CHEMICAL ANALYSIS FORM

IEPA/DLPC

RECORD CODE (1–6) LPCSM02 TRANS CODE (6) A

SITE INVENTORY NUMBER (9–18) 195050000 7 MONITOR POINT NUMBER (19–22) G105

CO. Whiteside

DATE COLLECTED (23–28) 11 / 11 / 99

Northwestern Steel & Wire Company Pre-RCRA Landfill
FACILITY NAME

LAB (29) 1

	LAB MEASUREMENTS CONSTITUENT DESCRIPTION AND REQUIRED UNIT OF MEASURE	STORET NUMBER (30–34)	Rem (35)	Rep (36)	< or > (37)	Value (38–47)
	cis-1,2-Dichloroethylene	77093				25.
	Vinyl Chloride	39175				13.

All analytical procedures must be performed in accordance with the methods contained in "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods," SW-846, 3rd Edition, September 1986 or equivalent methods approved by the Agency. Proper sample chain of custody control and quality assurance/quality control procedures must be maintained in accordance with the facility sampling and analysis plan.

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF LAND POLLUTION CONTROL
CHEMICAL ANALYSIS FORM

RECORD CODE: L P C S M 0 1 (1–7) TRANS CODE: A (8)

REPORT DUE DATE: 01 (36 M) / 15 (D) / 00 (Y 41)

FEDERAL ID NUMBER: _____

SITE INVENTORY NUMBER: 1 9 5 0 5 0 0 0 0 7 (9–18)

MONITOR POINT NUMBER (See instructions): G 1 1 1 (19 H, M, 58)

REGION: R CO.: Whiteside

DATE COLLECTED: 11 (23 M) / 11 (D) / 99 (Y 28)

FACILITY NAME: Northwestern Steel & Wire Company Pre-RCRA Landfill

FOR IEPA USE ONLY

LAB: _____ (29)

DATE RECEIVED: _____ (42 M) _____ (D) _____ (Y 47)

BACKGROUND SAMPLE (X): _____ (54) TIME COLLECTED (24 hr clock): 10 (55 H) : 40 (M 58)

UNABLE TO COLLECT SAMPLE (See instructions): _____ (59)

MONITOR POINT SAMPLED BY (See instructions): A (60) _____ OTHER (Specify)

SAMPLE FIELD FILTERED-INORGANICS (X): _____ (61) ORGANICS(X): _____ (62)

SAMPLE APPEARANCE (63–102): _____

COLLECTOR COMMENTS (103–142): _____

LAB COMMENTS (150–199): _____

RECORD CODE: L P C S M 0 2 (1–7) TRANS CODE: A (8) (COLUMNS 9-29 FROM ABOVE)

	FIELD MEASUREMENTS CONSTITUENT DESCRIPTION AND REQUIRED UNIT OF MEASURE	STORET NUMBER	REMARKS See Instr.	REPLICATE	< OR >	VALUE
Q	TEMP OF WATER (unfiltered F)	00011 (30–34)	(35)		(37)	55. (38–47)
Q	SPEC COND (unfiltered umhos)	00094				960.
Q	pH (unfiltered units)	00400				7.14
Q	ELEV OF GW SURF (ft ref MSL)	71993				617.16
Q	DEPTH OF WATER (ft below LS)	72019				3.9
A	BTM WELL ELEV (ft ref MSL)	72020				6.05
Q	DEPTH TO WATER FM MEA PT (ft)	72109				.

This Agency is authorized to require this information under Illinois Revised Statutes, 1979, chapter 111 1/2, Section 1004 and 1021. Disclosure of this information is required. Failure to do so may result in a civil penalty up to $25,000 for each day the failure continues a fine up to $1,000 and imprisonment up to one year. This form has been approved by the Forms Management Center. *Only keypunch with Data in Column 35 of Columns 38-47.*

REVISED

CHEMICAL ANALYSIS FORM

IEPA/DLPC

RECORD CODE (1–7) L P C S M 0 2 — TRANS CODE (8) A

SITE INVENTORY NUMBER (9–18) 1 9 5 0 5 0 0 0 0 7 — MONITOR POINT NUMBER (19–22) G 1 1 1

CO. Whiteside

DATE COLLECTED (23–28) 1 1 / 1 1 / 9 9

Northwestern Steel & Wire Company Pre-RCRA Landfill
FACILITY NAME

LAB (29) 1

	LAB MEASUREMENTS CONSTITUENT DESCRIPTION AND REQUIRED UNIT OF MEASURE	STORET NUMBER (30–34)	Rem (35)	Rep (36)	< or > (37)	Value (38–47)
	cis-1,2-Dichloroethylene	7 7 0 9 3				7.4
	Vinyl Chloride	3 9 1 7 5				12.

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ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF LAND POLLUTION CONTROL
CHEMICAL ANALYSIS FORM

RECORD CODE: L P C S M 0 1 (1–7) TRANS CODE: A (8)

REPORT DUE DATE: 01 (36 M) / 15 (D) / 00 (Y 41)

FEDERAL ID NUMBER: _____

SITE INVENTORY NUMBER: 1 9 5 0 5 0 0 0 0 7 (9–18)

MONITOR POINT NUMBER (See instructions): G 1 1 6 (19 H, M 58)

REGION: R CO.: Whiteside

DATE COLLECTED: 11 (23 M) / 11 (D) / 99 (Y 28)

FACILITY NAME: Northwestern Steel & Wire Company Pre-RCRA Landfill

FOR IEPA USE ONLY

LAB: _____ (29)

DATE RECEIVED: _____ (42 M) _____ (D) _____ (Y 47)

BACKGROUND SAMPLE (X): _____ (54) TIME COLLECTED (24 hr clock): 14 (55 H) : 25 (M 58)

UNABLE TO COLLECT SAMPLE (See instructions): _____ (59)

MONITOR POINT SAMPLED BY (See instructions): 3 (60) inertial pump (OTHER (Specify))

SAMPLE FIELD FILTERED-INORGANICS (X): _____ (61) ORGANICS(X): _____ (62)

SAMPLE APPEARANCE: (63 – 102)

COLLECTOR COMMENTS: (103 – 142)

LAB COMMENTS: (150 – 199)

RECORD CODE: L P C S M 0 2 (1–7) TRANS CODE: A (8) (COLUMNS 9-29 FROM ABOVE)

	FIELD MEASUREMENTS CONSTITUENT DESCRIPTION AND REQUIRED UNIT OF MEASURE	STORET NUMBER	REMARKS See Instr.	REPLICATE	< OR >	VALUE
Q	TEMP OF WATER (unfiltered F)	00011 (30–34)	(35)		(37)	53. (38–47)
Q	SPEC COND (unfiltered umhos)	00094				780.
Q	pH (unfiltered units)	00400				7.17
Q	ELEV OF GW SURF (ft ref MSL)	71993				611.96
Q	DEPTH OF WATER (ft below LS)	72019				14.64
A	BTM WELL ELEV (ft ref MSL)	72020				
Q	DEPTH TO WATER FM MEA PT (ft)	72109				14.64

This Agency is authorized to require this information under Illinois Revised Statutes, 1979, chapter 111 1/2, Section 1004 and 1021. Disclosure of this information is required. Failure to do so may result in a civil penalty up to $25,000 for each day the failure continues a fine up to $1,000 and imprisonment up to one year. This form has been approved by the Forms Management Center. *Only keypunch with Data in Column 35 of Columns 38-47.*

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CHEMICAL ANALYSIS FORM

IEPA/DLPC

RECORD CODE (1–7) LPCSM02 TRANS CODE (8) A

SITE INVENTORY NUMBER (9–18) 1950500007 MONITOR POINT NUMBER (19–22) G116

CO. Whiteside DATE COLLECTED (23–28) 11/11/99

Northwestern Steel & Wire Company Pre-RCRA Landfill
FACILITY NAME

LAB (29) 1

	LAB MEASUREMENTS CONSTITUENT DESCRIPTION AND REQUIRED UNIT OF MEASURE	STORET NUMBER (30–34)	Rem (35)	Rep (36)	< or > (37)	Value (38–47)
	cis-1,2-Dichloroethylene	77093				65.
	Vinyl Chloride	39175				28.

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ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF LAND POLLUTION CONTROL
CHEMICAL ANALYSIS FORM

RECORD CODE: L P C S M 0 1 (1–7) TRANS CODE: A (8)

REPORT DUE DATE: 01 (36 M) / 15 (D) / 00 (Y 41)

FEDERAL ID NUMBER: _____

SITE INVENTORY NUMBER: 1 9 5 0 5 0 0 0 0 7 (9–18)

MONITOR POINT NUMBER (See instructions): G 1 1 7 (19 H, M, 58)

REGION: R CO.: Whiteside

DATE COLLECTED: 11 (23 M) / 11 (D) / 99 (Y 28)

FACILITY NAME: Northwestern Steel & Wire Company Pre-RCRA Landfill

FOR IEPA USE ONLY

LAB: _____ (29)

DATE RECEIVED: _____ (42 M) _____ (D) _____ (Y 47)

BACKGROUND SAMPLE (X): _____ (54) TIME COLLECTED (24 hr clock): 14 (55 H) : 50 (M 58)

UNABLE TO COLLECT SAMPLE (See instructions): _____ (59)

MONITOR POINT SAMPLED BY (See instructions): 3 (60) inertial pump (OTHER (Specify))

SAMPLE FIELD FILTERED-INORGANICS (X): _____ (61) ORGANICS(X): _____ (62)

SAMPLE APPEARANCE: (63–102)

COLLECTOR COMMENTS: (103–142)

LAB COMMENTS: (150–199)

RECORD CODE: L P C S M 0 2 (1–7) TRANS CODE: A (8) (COLUMNS 9-29 FROM ABOVE)

	FIELD MEASUREMENTS CONSTITUENT DESCRIPTION AND REQUIRED UNIT OF MEASURE	STORET NUMBER (30–34)	REMARKS See Instr. (35)	REPLICATE	< OR > (37)	VALUE (38–47)
Q	TEMP OF WATER (unfiltered F)	00011				55.
Q	SPEC COND (unfiltered umhos)	00094				830.
Q	pH (unfiltered units)	00400				7.23
Q	ELEV OF GW SURF (ft ref MSL)	71993				611.60
Q	DEPTH OF WATER (ft below LS)	72019				13.37
A	BTM WELL ELEV (ft ref MSL)	72020				
Q	DEPTH TO WATER FM MEA PT (ft)	72109				13.37

This Agency is authorized to require this information under Illinois Revised Statutes, 1979, chapter 111 1/2, Section 1004 and 1021. Disclosure of this information is required. Failure to do so may result in a civil penalty up to $25,000 for each day the failure continues a fine up to $1,000 and imprisonment up to one year. This form has been approved by the Forms Management Center. *Only keypunch with Data in Column 35 of Columns 38-47.*

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CHEMICAL ANALYSIS FORM

IEPA/DLPC

RECORD CODE (1–7) LPCSM02 TRANS CODE (8) A

SITE INVENTORY NUMBER (9–18) 1950500007 MONITOR POINT NUMBER (19–22) G117

CO. Whiteside DATE COLLECTED (23–28) 11/11/99

Northwestern Steel & Wire Company Pre-RCRA Landfill
FACILITY NAME

LAB (29) 1

	LAB MEASUREMENTS CONSTITUENT DESCRIPTION AND REQUIRED UNIT OF MEASURE	STORET NUMBER (30–34)	Rem (35)	Rep (36)	< or > (37)	Value (38–47)
	cis-1,2-Dichloroethylene	77093				38.
	Vinyl Chloride	39175				89.
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All analytical procedures must be performed in accordance with the methods contained in "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods," SW-846, 3rd Edition, September 1986 or equivalent methods approved by the Agency. Proper sample chain of custody control and quality assurance/quality control procedures must be maintained in accordance with the facility sampling and analysis plan.

PDC Laboratories, Inc.
P.O. Box 9071 • Peoria, IL 61612-9071
(309) 692-9688 • (800) 752-6651 • FAX (309) 692-9689

Report Cover Page

Northwestern Steel & Wire Co.
121 Wallace Street

Sterling, IL 61081

Attn: Mr. Dave Long

Date Received: 11-Nov-99
Date Reported: 07-Jan-00
PO #:

Login No. 9911989

This report includes information regarding the following described samples as received by the laboratory and is only valid for the parameters tested. This report contains 9 results page(s) not including the cover page(s).

Sample No.	Client ID	Site	Locator	Tests/Services
9911989-1	NWSW GW	PRE-RCRA LF	MW 3	Volatiles, GC/MS Field Sampling Services
9911989-2	NWSW GW	PRE-RCRA LF	MW 4	Volatiles, GC/MS
9911989-3	NWSW GW	PRE-RCRA LF	MW 5	Volatiles, GC/MS
9911989-4	NWSW GW	PRE-RCRA LF	MW 11	Volatiles, GC/MS
9911989-5	NWSW GW	PRE-RCRA LF	MW 16	Volatiles, GC/MS
9911989-6	NWSW GW	PRE-RCRA LF	MW 17	Volatiles, GC/MS
9911989-7	NWSW GW	PRE-RCRA LF	MW 17 FIELD DUP	Volatiles, GC/MS
9911989-8	TRIP BLANK	PRE-RCRA LF	TRIP BLANK	Volatiles, GC/MS
9911989-9	EQUIPMENT BLANK	PRE-RCRA LF	EQUIPMENT BLANK	Volatiles, GC/MS

Certified by: Mark A. Williams
Mark A. Williams, Project Manager

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State of Illinois Chemical Analysis in Drinking Water Accredited Lab. No. 100230
State of Illinois Bacteriological Analysis in Drinking Water Certified Lab Registry No. 17533
State of Arkansas Certified Wastewater and Hazardous Waste Lab
State of Indiana Certified Drinking Water Lab No. C-IL-04
State of Iowa Certified Wastewater Lab No. 240
American Industrial Hygiene Association Bulk/Air Asbestos Proficiency Program Lab ID No. 101206
State of North Dakota Wastewater and Hazardous Waste CertifiedLab No. R-094
State of Wisconsin Certified Wastewater and Hazardous Waste Lab ID No. 998294430

PDC Laboratories, Inc.
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Laboratory Results

Northwestern Steel & Wire Co.
121 Wallace Street

Sterling, IL 61081

Attn: Mr. Dave Long

Date Received: 11-Nov-99
Date Reported: 07-Jan-00
PO #:

Login No. 9911989

Sample No: 9911989-1
Client ID: NWSW GW
Site: PRE-RCRA LF
Locator: MW 3
Collect Date: 11-NOV-99 12:40

Parameter	Result	Units	Date	By
SW-846 Method 8260B				
Vinyl chloride	140	ug/l	22-Nov-99 12:00	PSB
cis-1,2-Dichloroethene	17.	ug/l	22-Nov-99 12:00	PSB

PDC Laboratories, Inc.
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Laboratory Results

Northwestern Steel & Wire Co.
121 Wallace Street

Sterling, IL 61081

Attn: Mr. Dave Long

Date Received: 11-Nov-99
Date Reported: 07-Jan-00
PO #:

Login No. 9911989

Sample No: 9911989-2
Client ID: NWSW GW
Site: PRE-RCRA LF
Locator: MW 4
Collect Date: 11-NOV-99 11:55

Parameter	Result	Units	Date	By
SW-846 Method 8260B				
Vinyl chloride	87.	ug/l	22-Nov-99 12:00	PSB
cis-1,2-Dichloroethene	11.	ug/l	22-Nov-99 12:00	PSB

PDC Laboratories, Inc.
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Laboratory Results

Northwestern Steel & Wire Co.
121 Wallace Street

Sterling, IL 61081

Attn: Mr. Dave Long

Date Received: 11-Nov-99
Date Reported: 07-Jan-00
PO #:

Login No. 9911989

Sample No: 9911989-3
Client ID: NWSW GW
Site: PRE-RCRA LF
Locator: MW 5
Collect Date: 11-NOV-99 11:20

Parameter	Result	Units	Date	By
SW-846 Method 8260B				
Vinyl chloride	13.	ug/l	22-Nov-99 12:00	PSB
cis-1,2-Dichloroethene	25.	ug/l	22-Nov-99 12:00	PSB

PDC Laboratories, Inc.
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Laboratory Results

Northwestern Steel & Wire Co.
121 Wallace Street

Sterling, IL 61081

Attn: Mr. Dave Long

Date Received: 11-Nov-99
Date Reported: 07-Jan-00
PO #:

Login No. 9911989

Sample No: 9911989-4
Client ID: NWSW GW
Site: PRE-RCRA LF
Locator: MW 11
Collect Date: 11-NOV-99 10:40

Parameter	Result	Units	Date	By
SW-846 Method 8260B				
Vinyl chloride	12.	ug/l	22-Nov-99 12:00	PSB
cis-1,2-Dichloroethene	7.4	ug/l	22-Nov-99 12:00	PSB

PDC Laboratories, Inc.
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Laboratory Results

Northwestern Steel & Wire Co.
121 Wallace Street

Sterling, IL 61081

Attn: Mr. Dave Long

Date Received: 11-Nov-99
Date Reported: 07-Jan-00
PO #:

Login No. 9911989

Sample No: 9911989-5
Client ID: NWSW GW
Site: PRE-RCRA LF
Locator: MW 16
Collect Date: 11-NOV-99 14:25

Parameter	Result	Units	Date	By
SW-846 Method 8260B				
Vinyl chloride	28.	ug/l	22-Nov-99 12:00	PSB
cis-1,2-Dichloroethene	65.	ug/l	22-Nov-99 12:00	PSB

PDC Laboratories, Inc.
P.O. Box 9071 • Peoria, IL 61612-9071
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Laboratory Results

Northwestern Steel & Wire Co.
121 Wallace Street

Sterling, IL 61081

Attn: Mr. Dave Long

Date Received: 11-Nov-99
Date Reported: 07-Jan-00
PO #:

Login No. 9911989

Sample No: 9911989-6
Client ID: NWSW GW
Site: PRE-RCRA LF
Locator: MW 17
Collect Date: 11-NOV-99 14:50

Parameter	Result	Units	Date	By
SW-846 Method 8260B				
Vinyl chloride	89.	ug/l	22-Nov-99 12:00	PSB
cis-1,2-Dichloroethene	38.	ug/l	22-Nov-99 12:00	PSB

PDC Laboratories, Inc.
P.O. Box 9071 • Peoria, IL 61612-9071
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Laboratory Results

Northwestern Steel & Wire Co.
121 Wallace Street

Sterling, IL 61081

Attn: Mr. Dave Long

Date Received: 11-Nov-99
Date Reported: 07-Jan-00
PO #:

Login No. 9911989

Sample No: 9911989-7
Client ID: NWSW GW
Site: PRE-RCRA LF
Locator: MW 17 FIELD DUP
Collect Date: 11-NOV-99

Parameter	Result	Units	Date	By
SW-846 Method 8260B				
Vinyl chloride	84.	ug/l	22-Nov-99 12:00	PSB
cis-1,2-Dichloroethene	35.	ug/l	22-Nov-99 12:00	PSB

PDC Laboratories, Inc.
P.O. Box 9071 • Peoria, IL 61612-9071
(309) 692-9688 • (800) 752-6651 • FAX (309) 692-9689

Laboratory Results

Northwestern Steel & Wire Co.
121 Wallace Street

Sterling, IL 61081

Attn: Mr. Dave Long

Date Received: 11-Nov-99
Date Reported: 07-Jan-00
PO #:

Login No. 9911989

Sample No: 9911989-8
Client ID: TRIP BLANK
Site: PRE-RCRA LF
Locator: TRIP BLANK
Collect Date: 11-NOV-99

Parameter		Result	Units	Date	By
SW-846 Method 8260B					
Vinyl chloride	<	2.0	ug/l	22-Nov-99 12:00	PSB
cis-1,2-Dichloroethene	<	5.0	ug/l	22-Nov-99 12:00	PSB

PDC Laboratories, Inc.
P.O. Box 9071 • Peoria, IL 61612-9071
(309) 692-9688 • (800) 752-6651 • FAX (309) 692-9689

Laboratory Results

Northwestern Steel & Wire Co.
121 Wallace Street

Sterling, IL 61081

Attn: Mr. Dave Long

Date Received: 11-Nov-99
Date Reported: 07-Jan-00
PO #:

Login No. 9911989

Sample No: 9911989-9
Client ID: EQUIPMENT BLANK
Site: PRE-RCRA LF
Locator: EQUIPMENT BLANK
Collect Date: 11-NOV-99

Parameter		Result	Units	Date	By
SW-846 Method 8260B					
Vinyl chloride	<	2.0	ug/l	22-Nov-99 12:00	PSB
cis-1,2-Dichloroethene	<	5.0	ug/l	22-Nov-99 12:00	PSB

Level IV QC.

PDC LABORATORIES, INC.
2231 WEST ALTORFER DRIVE
PEORIA, IL 61615

PHONE # 309-692-9688
FAX # 309-692-9689

CHAIN OF CUSTODY RECORD

ALL SHADED AREAS MUST BE COMPLETED BY CLIENT (PLEASE PRINT)

(1) CLIENT	PROJECT NUMBER	P.O. NUMBER	MEANS SHIPPED
NWSW - Pre-RCRA			
ADDRESS	**PHONE NUMBER**	**FAX NUMBER**	**DATE SHIPPED**
CITY / STATE / ZIP	**SAMPLER (PLEASE PRINT)**		**MATRIX TYPES:** WW-WASTEWATER, DW-DRINKING WATER, GW-GROUND WATER, WWSL-SLUDGE, NAS-SOLID, OTHER:
	Mark Williams		
CONTACT PERSON	**SAMPLER'S SIGNATURE**		
Mr. Dave Long	Mark Williams		

(3) ANALYSIS REQUESTED: Vinyl Chloride; cis 1,2 - dichloroethylene

(4) (FOR LAB USE ONLY)
LOGIN # 991989
LOGGED BY: KB
LAB PROJ. #
TEMPLATE:
PROJ. MGR.: MAW

(2) SAMPLE DESCRIPTION	DATE COLLECTED	TIME COLLECTED	SAMPLE TYPE GRAB	SAMPLE TYPE COMP	MATRIX TYPE	TOTAL # OF CONT	REMARKS
MW-3	11-11-99	12:40					
MW-4	"	11:55					
MW-5	"	11:20					
MW-11	"	10:40					
MW-16	"	14:25					
MW-17	"	14:50					
MW-17 Field Dup	"						
Trip Blank	"						
Equipment Blank	"						

(5) TURNAROUND TIME REQUESTED (PLEASE CIRCLE) (RUSH TAT IS SUBJECT TO PDC LABS APPROVAL AND SURCHARGE) — NORMAL / RUSH

RUSH RESULTS VIA (PLEASE CIRCLE) — FAX / PHONE

FAX # IF DIFFERENT FROM ABOVE:

PHONE # IF DIFFERENT FROM ABOVE:

(6) *The sample temperature will be measured upon receipt at the lab. By initialing this area you request that the lab notify you, before proceeding with analysis, if the sample temperature is outside of the range of 0.1-6.0°C. By not initialing this area you allow the lab to proceed with analytical testing regardless of the sample temperature.* _____

(7)	DATE		DATE
RELINQUISHED BY: (SIGNATURE) Mark Williams	11-11-99	RECEIVED BY: (SIGNATURE)	
	TIME 1:01 C		TIME
RELINQUISHED BY: (SIGNATURE)	DATE	RECEIVED AT LAB BY: (SIGNATURE)	DATE 11/18
	TIME		TIME 18

(8) COMMENTS: (FOR LAB USE ONLY)

SAMPLE TEMPERATURE UPON RECEIPT	_____ °C
CHILL PROCESS STARTED PRIOR TO RECEIPT	Y OR N
SAMPLE(S) RECEIVED ON ICE	Y OR N
BOTTLES RECEIVED IN GOOD CONDITION	Y OR N
BOTTLES FILLED WITH ADEQUATE VOLUME	Y OR N
SAMPLES RECEIVED WITHIN HOLD TIME(S)	Y OR N

4th Quarter 1999

Pre-RCRA LF

NORTHWESTERN STEEL AND WIRE COMPANY
Sterling, Illinois

GROUND WATER FIELD SURVEY FORM

Federal I. D. ILD00526315
Ill Site 1950500007

Sample Point I.D. MW-3
Purge Date 11-11-99
Purge Time 12:18
Sample Date 11-11-99
Sample Time 12:40

Casing Vol. (gals) 4.4
Vol. Purged (gals) 13.3
Sample Method WaTerra
Seal No.

Elevation 15.06
Water Level
GW Elevation

Total Well Depth 42.28
Stick-Up
Sample Temp. (°C) 12.2

Weather Conditions
Sample Appearance
Sampler Comments

Unable To Obtain Sample (X)
Sample Composited (X)

Reason
Procedure/Proportions

pH 7.24
Sp. Cond (umhos) 820

~~Lab~~ Field

Comments	pH	Cond	Temp
Initial	7.64	170	12.4
1	7.22	755	12.2
2	7.22	810	12.2
3	7.24	820	12.2

24

I certify that sampling procedures were in accordance with EPA and corporate protocols.

Sampler Name (print) Mark Williams Signature Mark Williams

NORTHWESTERN STEEL AND WIRE COMPANY
Sterling, Illinois

GROUND WATER FIELD SURVEY FORM

Federal I. D. ILD005263157
Ill Site 1950500007

Sample Point I.D. MW-4
Purge Date 11-11-99
Purge Time 11:36
Sample Date 11-11-99
Sample Time 11:55

Casing Vol. (gals) 4.6
Vol. Purged (gals) 13.8
Sample Method WaTerra
Seal No.

Elevation 13.51
Water Level
GW Elevation

Total Well Depth 41.80
Stick-Up
Sample Temp. (°C) 12.1

Weather Conditions
Sample Appearance clear
Sampler Comments

Unable To Obtain Sample (X)
Sample Composited (X)

Reason
Procedure/Proportions

pH 7.29
Sp. Cond (umhos) 880

Field
Lab

Comments	pH	Cond	Temp
Initial	7.25	790	12.3
1	7.27	870	12.3
2	7.27	880	12.2
3	7.29	880	12.1
			# 7

I certify that sampling procedures were in accordance with EPA and corporate protocols.

Sampler Name (print) Mark Williams Signature Mark Williams

NORTHWESTERN STEEL AND WIRE COMPANY
Sterling, Illinois

GROUND WATER FIELD SURVEY FORM

Federal I. D. ILD005263157
Ill Site 1950500007

Sample Point I.D. MW-5
Purge Date 11-11-99
Purge Time 10:55
Sample Date 11-11-99
Sample Time 11:20

Casing Vol. (gals) 5.8
Vol. Purged (gals) 17.5
Sample Method Wetova
Seal No.

Elevation 12.52
Water Level
GW Elevation

Total Well Depth 48.40
Stick-Up
Sample Temp. (°C) 11.0° C

Weather Conditions
Sample Appearance
Sampler Comments

Unable To Obtain Sample (X)
Sample Composited (X)

Reason
Procedure/Proportions

pH	7.37			
Sp. Cond (umhos)	870			

Field
~~Lab~~

Comments	pH	Cond	Temp
Initial	7.86	140	11.9
1	7.28	710	11.6
2	7.31	810	11.5
3	7.33	870	11.2
7=7.03	100 - 980		≤ 24

I certify that sampling procedures were in accordance with EPA and corporate protocols.

Sampler Name (print) Mark Williams Signature Mark Williams

NORTHWESTERN STEEL AND WIRE COMPANY
Sterling, Illinois

GROUND WATER FIELD SURVEY FORM

Federal I. D. ILD005263157
Ill Site 1950500007

Sample Point I.D. MW-11
Purge Date 11-11-99
Purge Time 10:25
Sample Date 11-11-99
Sample Time 10:40

Casing Vol. (gals) 1.7
Vol. Purged (gals) 5.1
Sample Method Bailer Teflon
Seal No.

Elevation [illegible]
Water Level
GW Elevation

Total Well Depth 16.55
Stick-Up
Sample Temp. (°C) 12.4°C

Weather Conditions Cloudy - cool
Sample Appearance Turbid - odor
Sampler Comments

Unable To Obtain Sample (X)
Sample Composited (X)

Reason
Procedure/Proportions

pH 7.14
Sp. Cond (umhos) 760

Field ~~Lab~~

Comments	pH	Cond	~~Elev.~~ Temp
Initial	6.94	1120	11.8° c
1	7.04	1070	12.3° c
2	7.10	990	12.6° c
3	7.14	760	12.4°C

Equipment blank filled before purging this well.
At 1108

I certify that sampling procedures were in accordance with EPA and corporate protocols.

Sampler Name (print) Signature

NORTHWESTERN STEEL AND WIRE COMPANY
Sterling, Illinois

GROUND WATER FIELD SURVEY FORM

Federal I. D. ILD005263157
Ill Site 1950500007

Sample Point I.D. MW-16
Purge Date 11-11-99
Purge Time 14:05
Sample Date 11-11-99
Sample Time 14:25

Casing Vol. (gals) 5.5
Vol. Purged (gals) 16.5
Sample Method WaTerra
Seal No.

Elevation 14.61
Water Level
GW Elevation

Total Well Depth 48.37
Stick-Up
Sample Temp. (°C) 11.9

Weather Conditions
Sample Appearance Clear
Sampler Comments

Unable To Obtain Sample (X)
Sample Composited (X)

Reason
Procedure/Proportions

pH 7.17
Sp. Cond (umhos) 780

~~Lab~~ Field

Comments	pH	Cond	Temp
Initial	7.23	730	11.9
1	7.20	760	12.1
2	7.18	780	11.8
3	7.17	780	11.9
		# 95	

I certify that sampling procedures were in accordance with EPA and corporate protocols.

Sampler Name (print) Mark Williams Signature Mark Williams

NORTHWESTERN STEEL AND WIRE COMPANY
Sterling, Illinois

GROUND WATER FIELD SURVEY FORM

Federal I. D. ILD005263157
Ill Site 1950500007

Sample Point I.D. MW-17
Purge Date 11-11-99
Purge Time 14:37
Sample Date 11-11-99
Sample Time 14:50

Casing Vol. (gals) 3.4
Vol. Purged (gals) 10.2
Sample Method waterra
Seal No.

Elevation 13.37
Water Level
GW Elevation

Total Well Depth 34.27
Stick-Up
Sample Temp. (°C) 12.5

Weather Conditions
Sample Appearance clear
Sampler Comments

Unable To Obtain Sample (X)
Sample Composited (X)

Reason
Procedure/Proportions

pH 7.23
Sp. Cond (umhos) 830

Field
~~Lab~~

Comments	pH	Cond	Temp
Initial	7.20	740	12.6
1	7.21	820	12.5
2	7.23	830	12.5
3	7.23	830	12.5

T= 7.02 #17

I certify that sampling procedures were in accordance with EPA and corporate protocols.

Sampler Name (print) Mark Williams Signature Mark Williams